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MAR 28 2022

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Clerk of the Circuit Court
of Fairfax County, VA



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Clerk of the Circuit Court
of Fairfax County, VA

MAR 28 2022

FILED

Transcript of Sean Bett

Date: January 25, 2022

Case: Depp, II -v- Heard

Planet Depos

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WORLDWIDE COURT REPORTING & LITIGATION TECHNOLOGY

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WIT R GUN I A:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

- - - - - x

JOHN C. DEPP, II, :

Plaintiff :

: Civil Action No.

v. : CL2019-0002911

AMBER LAURA HEARD, :

Defendant :

- - - - - x

Videotaped Deposition of SEAN BETT

Conducted Virtually

Tuesday, January 25, 2022

12:30 p.m. EST

Job No.: 426241

Pages: 1 - 193

Reported By: Jessica Shines, CSR, RPR

Transcript of Sean Bett
Conducted on January 25, 2022

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1 Deposition of SEAN BETT, conducted virtually.
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13 Pursuant to subpoena, before Jessica Shines,
14 CSR, RPR, Notary Public in and for the
15 Commonwealth of Virginia.
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A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFF,
DEPP, AND THE DEPONENT, BETT:

CAMILLE VASQUEZ, ESQUIRE

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and

ON BEHALF OF THE PLAINTIFF,
DEPP, AND THE DEPONENT, BETT:

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A P P E A R A N C E S C O N T I N U E D

ON BEHALF OF THE DEFENDANT,

HEARD:

J. BENJAMIN ROTTENBORN, ESQUIRE

WOODS ROGERS PLC

Suite 1800

10 South Jefferson Street

Roanoke, Virginia 24011

540-983-7540

ALSO PRESENT:

AMBER HEARD, DEFENDANT

CATHERINE GONZALEZ, TECHNICIAN

THEO GREEN, VIDEOGRAPHER

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ALL EXHIBITS ATTACHED TO THE TRANSCRIPT

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P R O C E E D I N G S

THE VIDEOGRAPHER: Here begins Disk No. 1.
in the video recorded deposition of Sean Bett in
the matter of Depp, the II versus Heard in the
Circuit Court of Fairfax County, Virginia, Case
No. CL-2019-0002911.

12:34:53

12:34:55

12:34:57

12:35:03

12:35:06

Today's date is January 25th, 2022. The
time on the video monitor is 12:35 p.m. The
videographer today is Theo Green representing
Planet Depos. This video deposition is taking
place remotely.

12:35:11

12:35:15

12:35:20

12:35:23

12:35:26

Will counsel please voice identify
themselves and state whom they represent.

12:35:27

12:35:29

MR. ROTTENBORN: Good morning. This is
Ben Rottenborn here on behalf of Amber Heard.

12:35:31

12:35:32

MS. Vasquez: Camille Vasquez on behalf of
Mr. Depp and the witness, Sean Bett.

12:35:35

12:35:37

THE VIDEOGRAPHER: Thank you. The court
reporter today is Jessica Shines representing
Planet Depos. Would the reporter please swear in
the witness?

12:35:43

12:35:44

12:35:47

THE REPORTER: Mr. Bett, I'm going to give

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1 you an oath. Can you raise your right hand?

2 Do you swear or affirm on penalty of
3 perjury that the testimony you are about to give
4 today will be the truth, the whole truth, and
5 nothing but the truth?

6 THE WITNESS: I do.

7 THE REPORTER: Thank you.

8 Whenever you're ready, Counsel.

9 MR. ROTTENBORN: Thank you.

10 Whereupon,

11 SEAN BETT,

12 being first duly sworn or affirmed to tell the
13 truth, the whole truth, and nothing but the truth,
14 was examined and testified as follows:

15 EXAMINATION BY COUNSEL FOR THE DEFENDANT,

16 AMBER HEARD

17 BY MR. ROTTENBORN:

12:36:10

18 Q Mr. Bett, where are you physically located
19 for today's deposition?

12:36:10

12:36:15

20 A In Tampa, Florida.

12:36:16

21 Q Is that where you live?

12:36:19

22 A I have a second residence here.

12:36:21

Transcript of Sean Bett
Conducted on January 25, 2022

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1	Q Okay. What's your primary address?	12:36:24
2	A 380 East Michelle Street, West Covina,	12:36:27
3	California.	12:36:33
4	Q Okay. But you're in Tampa today?	12:36:35
5	A Correct.	12:36:39
6	Q How long are you in Florida?	12:36:40
7	A Probably for another week or so.	12:36:42
8	Q On vacation?	12:36:44
9	A No. I'm taking care of some house issues.	12:36:47
10	Q Is your -- am I correct that your counsel	12:36:51
11	for today's deposition is Ms. Vasquez?	12:36:56
12	A Correct.	12:37:00
13	Q I don't want to know about any	12:37:01
14	communications that you had with Ms. Vasquez or	12:37:04
15	people at her firm, but what did you do to prepare	12:37:06
16	for today's deposition?	12:37:09
17	A I went through some notes that I've taken	12:37:11
18	over the years -- or, correction, over the last	12:37:16
19	few months. And I took a look at my transcripts	12:37:19
20	from my testimony in the UK trial in 2020.	12:37:24
21	Q Okay. What do you mean, notes you've	12:37:28
22	taken over the last few months?	12:37:32

Transcript of Sean Bett
Conducted on January 25, 2022

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1	A By reading through my transcripts.	12:37:33
2	Q Okay. Notes that you've taken when you've	12:37:38
3	read through the transcripts?	12:37:44
4	A Correct.	12:37:46
5	Q Okay. Do you -- do you still have those	12:37:46
6	notes?	12:37:49
7	A I do.	12:37:50
8	Q Okay. I'm going to ask you to preserve	12:37:51
9	those notes because we may be -- may be requesting	12:37:55
10	them.	12:38:01
11	How long did you -- did you meet with, and	12:38:02
12	I don't know to know anything about the	12:38:05
13	communications or specific communications, but did	12:38:07
14	you meet with your counsel to prepare for the dep?	12:38:10
15	A Not in person, no.	12:38:13
16	Q Did you meet over Zoom or telephone?	12:38:15
17	A Telephone call.	12:38:17
18	Q When?	12:38:18
19	A Yesterday.	12:38:19
20	Q For about how long?	12:38:21
21	A Approximately an hour.	12:38:24
22	Q Did you review any -- other than the	12:38:27

Transcript of Sean Bett
Conducted on January 25, 2022

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1	testimony from the UK, did you review any	12:38:31
2	documents, other -- outside of your meeting with	12:38:34
3	your attorney?	12:38:39
4	A No.	12:38:40
5	Q Did you meet with Adam Waldman?	12:38:40
6	A No.	12:38:45
7	Q Is he your attorney?	12:38:45
8	A No.	12:38:48
9	Q When was the last time you spoke with	12:38:49
10	Mr. Waldman?	12:38:52
11	A Sometime in 2020, perhaps August or	12:38:55
12	September of 2020.	12:39:04
13	Q What was the nature of that conversation?	12:39:11
14	A I can't remember.	12:39:13
15	Q You haven't spoken to Mr. Waldman since	12:39:15
16	then?	12:39:19
17	A No.	12:39:20
18	Q Have you communicated with him via text or	12:39:20
19	email since then?	12:39:24
20	A No. I believe the last text and or phone	12:39:25
21	call was around that time in 2020.	12:39:29
22	Q Have you talked to Mr. Depp about this	12:39:37

Transcript of Sean Bett
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1	case -- well, let me ask you differently.	12:39:41
2	When was the last time you talked to	12:39:45
3	Mr. Depp about this case?	12:39:47
4	MS. VASQUEZ: Objection. Assumes facts	12:39:50
5	not in evidence.	12:39:53
6	Q You can answer.	12:39:56
7	A Probably around October of '21.	12:40:05
8	Q When was the last time you spoke to	12:40:14
9	Mr. Depp about anything?	12:40:16
10	A That would have been around mid December	12:40:17
11	of '21. Perhaps around the 20th or so was the	12:40:24
12	last time I saw him.	12:40:31
13	Q When was the last time you spoke to him?	12:40:34
14	A The last time I saw him, when I was in	12:40:36
15	Europe.	12:40:42
16	Q Have you had any text communications with	12:40:42
17	him since then?	12:40:44
18	A No.	12:40:45
19	Q Are you still employed by Mr. Depp?	12:40:45
20	A I am.	12:40:48
21	Q What were you doing in Europe?	12:40:48
22	A He was doing some work and traveling to --	12:40:56

Transcript of Sean Bett
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1	in the UK.	12:41:01
2	Q Was he filming?	12:41:03
3	A No.	12:41:05
4	Q What kind of work was he doing?	12:41:06
5	A He was attending some events.	12:41:08
6	Q And why haven't you seen him since then?	12:41:12
7	A Because now I have time off.	12:41:16
8	Q You've been off since mid December?	12:41:19
9	A Yes.	12:41:24
10	Q Are you still being paid by him?	12:41:25
11	A I am.	12:41:27
12	Q Is he in the United States now?	12:41:27
13	A No.	12:41:36
14	Q Do you have any other employment other	12:41:37
15	than your job for Mr. Depp?	12:41:43
16	A I've done contract security work over the	12:41:47
17	years.	12:41:51
18	Q Do you currently have any other	12:41:51
19	employment?	12:41:54
20	A As of today, no.	12:41:54
21	Q Have you since December of 2021, the last	12:41:56
22	time you saw Johnny?	12:42:00

Transcript of Sean Bett
Conducted on January 25, 2022

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1	A No.	12:42:03
2	Q When you spoke with Mr. Depp about this	12:42:06
3	case in October of 2021, what was -- what did you	12:42:09
4	talk about?	12:42:13
5	MS. VASQUEZ: I'm just going to caution	12:42:14
6	the witness not to reveal any communications if	12:42:16
7	they are privileged. If Mr. Depp's either UK	12:42:20
8	counsel or somebody from my firm was present or	12:42:24
9	Mr. Waldman, I'm going to caution the witness not	12:42:26
10	to disclose those communications and instruct him	12:42:29
11	not to answer that question.	12:42:32
12	MR. ROTTENBORN: And I'll just say that	12:42:34
13	just because a lawyer is present doesn't make it	12:42:36
14	privileged if he's speaking with Mr. Depp. So	12:42:39
15	I'll just say that for the record.	12:42:41
16	Q So what were the nature of your	12:42:43
17	communications with Mr. Depp about this case in	12:42:45
18	October?	12:42:48
19	MS. VASQUEZ: My objections still stands.	12:42:48
20	So if you can disclose the nature -	12:42:51
21	MR. ROTTENBORN: I'm sorry?	12:42:51
22	MS. VASQUEZ: I said my objection still	12:42:51

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1	stands.	12:42:53
2	So if you can disclose the nature of the	12:42:54
3	communications with Mr. Depp relating to this	12:42:57
4	case, as long as a lawyer wasn't present and, you	12:42:59
5	know, you weren't disclosing privileged	12:43:03
6	information, then go ahead and answer it. But if	12:43:05
7	you can't, I will instruct you not to answer.	12:43:08
8	A I believe it was privileged information,	12:43:10
9	so I shouldn't answer -- counsel.	12:43:13
10	Q Was an attorney present when you talked to	12:43:16
11	him?	12:43:18
12	A No.	12:43:18
13	Q Have you spoken with Stephen Dueters about	12:43:18
14	this case?	12:43:35
15	A Over the years, yes.	12:43:36
16	Q And I'll just say, do you understand when	12:43:39
17	I'm saying spoken, I'm referring to	12:43:42
18	communications, so texts, in person, over the	12:43:44
19	phone, emails, that sort of thing?	12:43:47
20	Is that -- are we on the same page there?	12:43:50
21	A Yes.	12:43:52
22	Q When did you -- when was the last time you	12:43:53

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1	spoke to Mr. Dueters about this case?	12:43:57
2	A I can't remember. Sometime in 2021, but I	12:44:00
3	don't have a specific month or day.	12:44:05
4	Q Other than your attorneys, have you spoken	12:44:09
5	with anyone about this case in the last month?	12:44:12
6	A No.	12:44:22
7	Q What's been the nature of your	12:44:22
8	communications? What -- what did Mr. -- you and	12:44:25
9	Mr. Dueters discuss about this case?	12:44:28
10	MS. VASQUEZ: And, again, I'm just going	12:44:31
11	to caution the witness that to the extent that	12:44:33
12	this calls for attorney-client privileged	12:44:35
13	information, because we represent Mr. Dueters as	12:44:37
14	well, I will just caution you not to disclose it.	12:44:40
15	If you can talk about it and it doesn't disclose	12:44:43
16	privileged information, then feel free to answer	12:44:48
17	the question.	12:44:51
18	Q And I'll make clear that my questioning is	12:44:52
19	not designed, Mr. Bett, to get at anything that	12:44:54
20	your attorneys have told you about this case or	12:44:57
21	any -- any advice from attorneys that you've	12:44:59
22	learned from anything else.	12:45:01

1 So if you're talking to Mr. Dueters and 12:45:02
2 he's saying, Camille Vasquez told me this, I don't 12:45:06
3 want to know about that. And I think Camille 12:45:09
4 knows that I'm not asking about that. So just so 12:45:12
5 you know that as well. 12:45:15

6 I guess what I'm asking for, Mr. Bett, is 12:45:16
7 to describe your communications with Mr. Dueters 12:45:20
8 relating to the factual things that are in dispute 12:45:23
9 in this case, the facts that either of you may 12:45:27
10 have witnessed, which I don't believe is 12:45:30
11 privileged. 12:45:32

12 A Well, based on what my attorney is 12:45:32
13 saying -- privileged information and about facts 12:45:35
14 within the case, so I'm going to choose not to 12:45:39
15 answer it. 12:45:42

16 Q You're choosing not to tell me what facts 12:45:43
17 about this case you discussed with Mr. Dueters? 12:45:46

18 A Well, it had to do with attorneys as well. 12:45:48
19 So according to Ms. Vasquez, that's privileged 12:45:51
20 information, so I'm not going to answer it. 12:45:55

21 MR. ROTTENBORN: And, Camille, are you 12:45:58
22 instructing him not to answer that question? 12:46:02

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1	MS. VASQUEZ: I'm instructing him not to	12:46:03
2	answer any questions that relate to advice that	12:46:06
3	he's received from any of his attorneys or	12:46:09
4	Mr. Dueter's attorneys. If he can disclose the	12:46:12
5	nature of the communication, as long as it just	12:46:14
6	pertains to a fact in this case, nothing you've	12:46:17
7	heard from counsel, feel free to answer the	12:46:19
8	question.	12:46:22
9	But if it relates to advice or privileged	12:46:22
10	information you've received by counsel or	12:46:26
11	Mr. Dueters has received by counsel, I will	12:46:28
12	instruct you not to answer that question.	12:46:30
13	BY MR. ROTTENBORN:	12:46:30
14	Q So with that instruction, Mr. Bett, are	12:46:36
15	you -- can you tell me what communications you and	12:46:40
16	Mr. Dueters have had about the facts of this case?	12:46:44
17	A We've talked about the upcoming trial, and	12:46:46
18	we've talked about when our depositions were going	12:46:52
19	to take place sometime in 2022.	12:46:58
20	Q And what have you talked about with	12:47:01
21	respect to the upcoming trial?	12:47:03
22	A The specific dates and Mr. Depp's schedule	12:47:05

Transcript of Sean Bett
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IU

1

and so forth.

12:47:09

2

Q Have you talked with anyone else, other

12:47:10

3

than your attorneys, about the testimony that you

12:47:26

4

expect to give today, or expect to be asked about

12:47:30

5

at trial?

12:47:34

6

A No.

12:47:35

7

Q How long have you worked for Johnny?

12:47:35

8

A I'm going to have to do the math on this.

12:47:48

9

Approximately going on 16 years now.

12:47:51

10

Q So approximately 2006?

12:47:59

11

A '7. The end of 2007 and 2008.

12:48:02

12

Q And has -- has Mr. Depp's employment been

12:48:07

13

your sole employment over that period of time?

12:48:13

14

A No. I've had other security details that

12:48:16

15

you've worked.

12:48:20

16

Q What are those?

12:48:20

17

A Well, I can't disclose the clientele, but

12:48:21

18

I've had other securities I've worked on.

12:48:25

19

Q Are -- are these in the nature of your

12:48:32

20

contract security work that you were referring to?

12:48:35

21

A Correct.

12:48:39

22

Q So does that mean you're employed for a

12:48:39

IU	1	specific finite period of days or a specific trip	12:48:46
	2	or a specific event, something of that nature?	12:48:50
	3	A Correct.	12:48:54
	4	Q And I don't need to know about that or who	12:48:54
	5	you -- you've worked for.	12:48:58
	6	I guess my question is, have you had other	12:49:00
	7	full-time employment since you were employed by	12:49:03
	8	Mr. Depp?	12:49:07
	9	A It's been mostly contract work. So	12:49:07
	10	specific weeks, days, et cetera.	12:49:12
	11	Q Would you consider yourself to be a	12:49:15
	12	full-time employee of Johnny?	12:49:18
	13	A I do.	12:49:21
	14	Q How much do you make working for Johnny?	12:49:21
	15	MS. VASQUEZ: Objection. I'm going to	12:49:26
	16	object to that. Calls for confidential private	12:49:28
	17	information. The Court has already ruled that	12:49:32
	18	that's not discoverable in this case, so I'm going	12:49:36
	19	to, on that basis, instruct the witness not to	12:49:39
	20	answer that question.	12:49:42
	21	MR. ROTTENBORN: Yeah, and I'll disagree.	12:49:43
	22	I don't think the Court has ruled that it's not	12:49:45

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1 discoverable. I think the court ordered the 12:49:47
2 discovery of the production of certain -- certain 12:49:50
3 payments, certain lump payments. But obviously 12:49:53
4 whether or not any amount that Mr. Bett makes by 12:49:56
5 working for Johnny goes towards bias, goes toward 12:50:01
6 witness credibility. So I think that he should 12:50:07
7 answer. 12:50:09

8 MS. VASQUEZ: Well, we can agree to 12:50:10
9 disagree, Ben, on that. I think the Court was 12:50:13
10 very clear. We had to identify who are paid 12:50:16
11 employees of Mr. Depp's. We've done that in 12:50:19
12 discovery. 12:50:23

13 You can ask other questions about gifts or 12:50:23
14 -- you know, up to a certain amount that perhaps 12:50:26
15 have been paid to Mr. Bett or other employees of 12:50:28
16 Mr. Depp's, but you're not getting into his 12:50:31
17 salary. That's private, confidential under 12:50:34
18 California law, and according to the Virginia 12:50:36
19 order. So, on that basis, I'm going to instruct 12:50:38
20 the witness not to answer. 12:50:41

21 MR. ROTTENBORN: Well, I think that that's 12:50:42
22 an inappropriate objection, but we'll move forward 12:50:44

1	--	12:50:47
2	MS. VASQUEZ: Okay.	12:50:47
3	MR. ROTTENBORN: -- and agree to disagree	12:50:48
4	on that.	12:50:51
5	BY MR. ROTTENBORN:	12:50:51
6	Q Do you make a salary from Mr. Depp?	12:50:54
7	A I do.	12:50:56
8	Q Do you -- do you receive bonuses from	12:50:56
9	Mr. Depp?	12:51:00
10	A No.	12:51:00
11	Q Is it just a straight up -- is it a	12:51:01
12	monthly salary?	12:51:04
13	A Correct.	12:51:06
14	Q And you've never received a bonus from	12:51:06
15	Mr. Depp?	12:51:09
16	A I have in previous years.	12:51:10
17	Q What years have you received a bonus?	12:51:12
18	A I can't remember. It was early on in --	12:51:15
19	when I first started working for Mr. Depp and the	12:51:22
20	family.	12:51:26
21	Q What entity are you employed by?	12:51:27
22	A Through his -- well, I'm employed through	12:51:32

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1	Mr. Depp. I don't understand what entity.	12:51:39
2	Q Does Mr. Depp himself sign your paycheck,	12:51:43
3	or is it an entity that he --	12:51:47
4	A His -- one of his companies does.	12:51:51
5	Q Which company is that?	12:51:54
6	A Scaramanga.	12:51:56
7	Q Do you -- have you ever received any cash	12:51:59
8	gifts from Mr. Depp?	12:52:02
9	A I've received cash gifts through a	12:52:05
10	previous security company that contracted with	12:52:09
11	Mr. Depp, and I was employed by them early on.	12:52:14
12	From 2007 and '8 and so forth.	12:52:18
13	Q And that was before you were employed	12:52:29
14	directly by Mr. Depp?	12:52:31
15	A Correct.	12:52:33
16	Q Have you ever received any monetary gifts	12:52:33
17	were Mr. Depp, outside of your salary?	12:52:36
18	A Through his management office, I have.	12:52:40
19	Q And what are the -- when -- when did you	12:52:43
20	receive those gifts?	12:52:48
21	A The last gift I received was around 2015	12:52:50
22	or '16, I believe. And all of us that worked at	12:52:55

1	his Los Angeles estate received a small little	12:53:00
2	Christmas wine and cheese basket.	12:53:07
3	Q Have you ever gotten a --	12:53:14
4	A I'm sorry? And that was sent through his	12:53:15
5	Scaramanga Brothers and management office.	12:53:20
6	Q Okay. Have you ever received any monetary	12:53:24
7	gifts from Mr. Depp?	12:53:28
8	A No.	12:53:30
9	Q Have you ever borrowed money from	12:54:00
10	Mr. Depp?	12:54:02
11	A I haven't.	12:54:03
12	Q Was there ever a time when your paycheck	12:54:04
13	-- and I'm not asking for the amount of it, but	12:54:33
14	was there ever a time when it was less than it	12:54:37
15	would otherwise have been as a result of money	12:54:42
16	that you owed Mr. Depp or Scaramanga Brothers?	12:54:44
17	MS. VASQUEZ: Objection. Assumes facts	12:54:48
18	not in evidence. It's vague.	12:54:51
19	If you can understand it and answer it,	12:54:54
20	feel free.	12:54:57
21	A Well, I've never owed Mr. Depp money so	12:55:01
22	I'm having difficulty understanding the question.	12:55:05

1	So, therefore, I wouldn't pay him back something	12:55:08
2	that was never owed.	12:55:11
3	Q So he's never loaned -- neither he nor his	12:55:13
4	companies have ever loaned you money?	12:55:16
5	A No.	12:55:19
6	MS. VASQUEZ: Objection. Asked and	12:55:22
7	answered.	12:55:22
8	Q What was your -- had you worked in --	12:55:24
9	well, let's start here.	12:55:27
10	Take me through your -- your -- any	12:55:28
11	education that you have above high school and then	12:55:30
12	your work history at a high level.	12:55:32
13	A I have two years of college at which point	12:55:36
14	I terminated going to school, where I joined the	12:55:45
15	LA County Sheriff's Department.	12:55:49
16	Q When was that? Was that 1990?	12:55:57
17	A 1990, correct.	12:55:59
18	Q What were your -- where were you stationed	12:56:00
19	initially?	12:56:02
20	A Initially, I was stationed at Men's	12:56:02
21	Central Jail. And from there I was assigned to	12:56:05
22	the Lynnwood/Firestone Park stations.	12:56:09

1	Q How long did you work for the sheriff's	12:56:14
2	office?	12:56:20
3	A Just a little over 14 years.	12:56:20
4	Q Okay. Until 2004?	12:56:23
5	A Correct.	12:56:26
6	Q Did you -- what were your job	12:56:26
7	responsibilities in the sheriff's office?	12:56:31
8	A I was a patrol deputy. I was a special	12:56:33
9	details deputy. I was a detective.	12:56:38
10	Q What -- what does a patrol deputy do?	12:56:40
11	A Handles calls for service within the	12:56:44
12	community.	12:56:47
13	Q What's the difference between a sheriff	12:56:48
14	and -- someone who works at the LA sheriff's	12:56:51
15	office and a member of the LAPD?	12:56:58
16	A Well, they both have patrol stations in	12:57:01
17	which they both do the same duties. The	12:57:04
18	difference with the Sheriff's Department is they	12:57:07
19	run the county jail, they run all the jails within	12:57:11
20	Los Angeles County, and they have deputies that	12:57:15
21	are assigned to the courthouses within Los Angeles	12:57:18
22	County.	12:57:21

1	Q Okay. But they also patrol out in the	12:57:21
2	community?	12:57:25
3	A Yes. They patrol unincorporated areas of	12:57:25
4	L.A. County, and they also patrol contract cities.	12:57:29
5	Q Is it -- is it common for your work, or a	12:57:35
6	patrol deputy's work, to overlap with someone on	12:57:39
7	the LAPD?	12:57:44
8	A Yes.	12:57:45
9	Q You might respond to the same scene or	12:57:45
10	same event?	12:57:51
11	A Correct. If they're requesting assistance	12:57:54
12	and we happen to be on the border of their	12:57:57
13	jurisdiction, they'll request our assistance. And	12:58:00
14	there's been times when we've requested their	12:58:03
15	assistance.	12:58:06
16	Q So I imagine over the course of your	12:58:08
17	career you came to know a number of LAPD	12:58:12
18	employees, right?	12:58:15
19	MS. VASQUEZ: Objection. Leading.	12:58:16
20	Assumes facts not in evidence.	12:58:19
21	MR. ROTTENBORN: Well, and I'll just say	12:58:23
22	for the record I'm going to be leading the witness	12:58:25

1 since he's clearly an adverse witness, but -- 12:58:32

2 MS. VASQUEZ: And I'm going to object to 12:58:34

3 that. I don't think Mr. Bett is an adverse 12:58:37

4 witness, but we can agree to disagree again on 12:58:40

5 that. 12:58:44

6 MR. ROTTENBORN: He's represented by the 12:58:44

7 same counsel as -- it speaks for itself. 12:58:45

8 BY MR. ROTTENBORN: 12:58:45

9 Q But, Mr. Bett, where did you -- I'll ask 12:58:49

10 my question again. 12:58:49

11 Is it fair to say you came to know a 12:58:52

12 number of LAPD employees during the course of your 12:58:53

13 time at the Sheriff's Department? 12:58:57

O 14 MS. VASQUEZ: Objection. Vague as to a 12:59:00

15 lot of LAPD employees. 12:59:08

16 Q Go ahead and answer. 12:59:11

17 A Personally, not really in the field. 12:59:13

18 Seeing, you know, the same guys in your area, you 12:59:18

19 would know enemy. But as far as being close 12:59:22

20 off-duty with any LAPD, no, I -- pretty much, you 12:59:26

21 know, my buddies were with the Sheriff's 12:59:30

22 Department. 12:59:34

Transcript of Sean Bett
Conducted on January 25, 2022

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1	Q Yeah, and I didn't ask you about your	12:59:34
2	buddies. But you know a lot of LAPD employees,	12:59:36
3	right?	12:59:40
4	A No, I wouldn't say I know a lot of them.	12:59:40
5	Q More than 25?	12:59:44
O 6	MS. VASQUEZ: Objection. Vague as to	12:59:45
7	time.	12:59:47
8	Q You can answer, Mr. Bett. Unless your	12:59:56
9	attorney instructs you not to answer, you have to	12:59:58
10	answer my questions.	12:59:58
11	So do you know more than 25 LAPD	13:00:00
12	employees?	13:00:03
13	A Okay. Like, the interpretation of know --	13:00:03
14	are you asking if I ever said hello or made	13:00:07
15	contact with more than 25, or do I know them by a	13:00:10
16	first and last name basis? Which do you mean.	13:00:14
17	Q Well, let's start, do you know more than	13:00:18
18	25 by a first and last name basis?	13:00:20
19	A No.	13:00:23
20	Q Have you -- over the course of your veer	13:00:23
21	as both a sheriff's office employee and a private	13:00:27
22	security guard, have you -- have you worked with	13:00:31

1 or met more than 25 LAPD employees? 13:00:40

O 2 MS. VASQUEZ: Objection. Vague, compound. 13:00:47

3 THE WITNESS: Can I answer now? 13:00:59

4 MS. VASQUEZ: Yes. 13:01:02

5 THE WITNESS: Okay. 13:01:03

6 MS. VASQUEZ: If you can. 13:01:04

7 A In the course of my career, I've met over, 13:01:09

8 you know, 25 LAPD officers. 13:01:12

R 9 Q Did you have a disciplinary record at the 13:01:14
10 sheriff's office? 13:01:17

11 A What do you mean by disciplinary record? 13:01:18

12 Q Were you ever disciplined for any 13:01:21

13 wrongdoing in your job there? 13:01:24

14 A I've had complaints. 13:01:26

15 Q What were the nature of those complaints? 13:01:30

16 Well, let me ask you this. Have you ever 13:01:35

17 had any complaints that were -- that resulted in a 13:01:39

18 disciplinary record for you? I know, you know, a 13:01:42

19 prisoner can make a complaint about anyone or 13:01:44

20 anything, but have you ever had any complaints 13:01:47

21 that were -- that resulted in a disciplinary 13:01:49

22 record in your file? 13:01:51

1	A That's going back so long, I can't confirm	13:01:52
2	or deny.	13:01:55
3	Q So you can't sit here -- sitting here	13:01:56
4	today, you can't say that you have had no -- that	13:02:02
5	you have no disciplinary record as -- for your	13:02:05
6	time at the sheriff's office?	13:02:07
7	A I just -- I've been at the sheriff's	13:02:08
8	office for some time. I know I've had complaints	13:02:12
9	from the field and so forth, but as far as me	13:02:15
10	being disciplined, I've never done days off. It's	13:02:18
11	possible I could have been given a written	13:02:22
12	reprimand, but I just can't remember. I don't	13:02:25
13	have my personnel file with you.	13:02:29
14	Q Well, what was the -- if it's -- if you	13:02:30
15	received a written reprimand, what was that for?	13:02:33
O 16	MS. VASQUEZ: Objection. Assumes facts	13:02:36
17	not in evidence. Asked and answered.	13:02:40
18	A A written reprimand can be for anything.	13:02:44
19	Q I know. Was there a specific incident in	13:02:49
20	mind, is what I'm getting at.	13:02:52
21	A No, none that I can recall right now.	13:02:53
22	Q Did you -- so you left the sheriff's	13:02:57

1	office in 2004. You started working for Johnny in	13:03:00
2	2007.	13:03:04
3	What did you do from 2004 to 2007?	13:03:05
4	A I did security contract work and private	13:03:09
5	investigations.	13:03:13
6	Q Was this for the company that gave you	13:03:14
7	cash gifts and that -- for whom you initially	13:03:17
8	worked when you met Johnny?	13:03:21
O 9	MS. VASQUEZ: Objection. Compound.	13:03:23
10	A I did do some work with that company, yes.	13:03:29
11	Q Were you self-employed from 2004 to 2007?	13:03:35
12	I guess that's my question.	13:03:40
13	A It varied. I did work for companies, and	13:03:42
14	there was some work I did where I was	13:03:45
15	self-employed.	13:03:52
16	Q How did you meet Johnny?	13:03:52
17	A The security company that I done work with	13:03:54
18	prior had asked me if I wanted to work his estate.	13:03:57
19	Again, that was around 2007 into 2008. And that's	13:04:01
20	when I first met him.	13:04:06
21	Q What does work his estate mean?	13:04:08
22	A That means you handle, you know, security	13:04:15

1	issues that may arise, you know, at his estate for	13:04:20
2	-- whether it's personal property or him or his	13:04:25
3	family.	13:04:29
4	Q Okay.	13:04:30
5	Were you -- just tell me about those early	13:04:41
6	years. Before -- before you met Amber Heard, what	13:04:48
7	was the -- what was the nature of the work you did	13:04:54
8	for Mr. Depp?	13:04:59
9	A Mostly handling duties around the estate.	13:05:00
10	Driving his children around to school and so	13:05:03
11	forth.	13:05:03
12	THE REPORTER: I'm sorry. Driving his	13:05:03
13	children around to school -- what was the last	13:05:03
14	part?	13:05:03
15	THE WITNESS: And so forth. To visit	13:05:18
16	friends.	13:05:19
17	BY MR. ROTTENBORN:	13:05:23
18	Q When did you become an employee of	13:05:23
19	Scaramanga Brothers or an employee of Mr. Depp?	13:05:27
20	A I'm sorry. Your voice was cutting out.	13:05:29
21	Can you repeat that?	13:05:32
22	Q Sorry. Yeah, no, thanks. If you can't	13:05:34

1	hear any questions I ask, please let me know. I	13:05:37
2	appreciate it.	13:05:39
3	When did you become an -- employed by	13:05:41
4	Mr. Depp?	13:05:44
O 5	MS. VASQUEZ: Asked and answered.	13:05:44
6	A Well, I became an employee with Mr. Depp	13:05:51
7	from 2007, around 2007-8, with the security	13:05:55
8	company. Working directly for Scaramanga was	13:06:03
9	around 2016 or '17, I believe.	13:06:07
10	Q Got it. Okay.	13:06:12
11	So were you with the security company from	13:06:13
12	2007, or when you first met Mr. Depp, until you	13:06:19
13	started being paid by or started working for	13:06:28
14	Scaramanga in 2016 or 2017?	13:06:36
15	A Correct. That's who I was getting my	13:06:40
16	paycheck from.	13:06:43
17	Q Got it. Okay.	13:06:46
18	Is your -- do -- I imagine working for	13:06:47
19	Mr. Depp, you have -- your hours can be somewhat	13:06:49
20	irregular; is that fair?	13:06:53
21	A That's correct.	13:06:56
22	Q What's the -- are you kind of on call	13:06:57

1	24/7, or how does that work?	13:07:00
2	A It actually depends on where we are in the	13:07:04
3	world as far as shifts and partners and, you know,	13:07:11
4	if we're switching off and so forth. So it just	13:07:15
5	really depends where we're at.	13:07:19
6	Q Okay. Now, you didn't -- you didn't	13:07:21
7	typically travel with Mr. Depp, right?	13:07:24
O 8	MS. VASQUEZ: Objection. Vague.	13:07:27
9	Q Go ahead.	13:07:31
10	A When I first started working --or for	13:07:32
11	Mr. Depp, no, initially, I wasn't traveling with	13:07:36
12	him.	13:07:39
13	Q And through the time -- I mean through the	13:07:39
14	present day, are you his primary security when he	13:07:44
15	travels?	13:07:51
16	A Me and one other individual.	13:07:51
17	Q Who's that?	13:07:53
18	A Malcolm Connolly.	13:07:55
19	Q Is it fair to say that the primary	13:08:05
20	security that you provided Mr. Depp was when he	13:08:10
21	was in Los Angeles, though?	13:08:13
22	A Correct.	13:08:15

1 Q How have you communicated typically with 13:08:15

2 Mr. Depp over the years? By -- if he wants to 13:08:19

3 reach out to you, is it typically by text? 13:08:23

4 A Over the years, if we were in Los Angeles, 13:08:25

5 he would call the security guard office that he 13:08:28

6 had on his estate. And most of the communications 13:08:33

7 were made by him, you know, picking up the phone 13:08:38

8 inside the residence or using his cell phone and 13:08:43

9 calling the office. 13:08:45

10 Q If he wants to -- when he -- it was not 13:08:46

11 uncommon for you and Mr. Depp to text each other, 13:08:50

12 though, right? 13:08:53

O 13 MS. VASQUEZ: Objection. Vague as to 13:08:54

14 time. 13:08:55

15 Q Lets say from 2010 to 20 -- to the 13:09:00

16 present. It's not uncommon for you all to text 13:09:05

17 each other, right? 13:09:10

18 A I would estimate the -- the initial stage 13:09:11

19 where the communications were done via text were 13:09:14

20 probably around 2012 or '13, give or take, up 13:09:17

21 until the present. 13:09:22

22 Q Okay. But if he needs you, he has your 13:09:24

Transcript of Sean Bett
Conducted on January 25, 2022

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1	cell phone number and he can call you too?	13:09:28
2	A Yes. He usually just sends me a text.	13:09:30
3	Q Does he -- have you and he ever had any	13:09:35
4	email communications?	13:09:38
5	A I don't believe so, but I can't be sure at	13:09:42
6	this time.	13:09:59
7	MR. ROTTENBORN: I'd ask the tech, please,	13:09:59
8	to -- to pull up the exhibit entitled 2020/02/04	13:10:05
9	Heard Subpoena for Sean Bett, please.	13:10:14
10	THE TECHNICIAN: Please stand by. Please	13:10:17
11	stand by.	13:10:20
12	Sharing Exhibit 1.	13:10:52
13	MR. ROTTENBORN: Thank you.	13:11:00
14	(BETT Exhibit 1, Bett Subpoena, was marked	13:11:00
15	for identification and is attached to the	13:11:00
16	transcript.)	13:11:00
17	BY MR. ROTTENBORN:	13:11:00
18	Q Mr. Bett, this is a subpoena that was	13:11:02
19	issued to you in this case. And when I show you	13:11:07
20	documents today, you can take all the time you	13:11:12
21	need to look through them.	13:11:17
22	But my first question to you is, have you	13:11:18

Transcript of Sean Bett
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1	ever seen this document before?	13:11:22
2	MS. VASQUEZ: I'll just have -- make sure	13:11:23
3	the witness either has access to the document or	13:11:25
4	it can be scrolled down. It's, as you can see,	13:11:29
5	Mr. Bett, a 29-page document, so please make sure	13:11:33
6	you review it before you answer any questions.	13:11:39
7	THE TECHNICIAN: Mr. Bett? Mr. Bett, this	13:11:39
8	is the technician. I'm happy to give you remote	13:11:41
9	control, if you'd like to scroll.	13:11:43
10	THE WITNESS: Yes, I'd like to scroll.	13:11:46
11	THE TECHNICIAN: There you are.	13:11:49
12	THE WITNESS: Okay. Thank you.	13:11:52
13	A This document doesn't look familiar --	13:12:06
14	familiar to me.	13:12:10
15	Q Okay. Can you just, if you wouldn't mind,	13:12:12
16	go to -- it's sort of toward the bottom. It's	13:12:15
17	page 25 and 26 of the PDF.	13:12:21
18	A All right. Let me just --	13:12:26
19	Q Sure.	13:12:26
20	A It's taking a while to scroll with my	13:12:28
21	mouse.	13:12:33
22	Q Yeah, right there.	13:12:36

Transcript of Sean Bett
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1	A 25? Okay.	13:12:37
2	Q In particular, have you ever seen those	13:12:39
3	document requests of you?	13:12:43
4	A I -- I can't say that I have. It doesn't	13:12:55
5	look familiar.	13:12:58
6	Q What -- what did you do to search for	13:12:59
7	documents responsive to those requests to produce	13:13:09
8	to our side in this case?	13:13:15
9	MS. VASQUEZ: Objection. Assumes facts	13:13:18
10	not in evidence. Lack of foundation.	13:13:22
11	Q Did you take any step --- now, you're aware	13:13:28
12	you produced some documents in this case, right?	13:13:30
13	A Correct, I am.	13:13:32
14	Q About 64 pages or so. Does that sound	13:13:38
15	about right?	13:13:45
16	A I couldn't tell you how many pages there	13:13:45
17	were.	13:13:48
18	Q What did you do to -- to search for and	13:13:48
19	collect those documents?	13:13:54
20	A Well, I checked my emails to see if I	13:13:55
21	could come up with anything. I checked the cloud	13:13:59
22	that I have, and anything that was produced would	13:14:09

1	have come from that.	13:14:12
2	Q What -- is it an iCloud account?	13:14:13
3	A It's a Verizon cloud or -- same thing.	13:14:17
4	Verizon, iCloud.	13:14:22
5	Q Okay. You've always used an iPhone since,	13:14:24
6	say 2010, forward?	13:14:28
7	A I've never owned an iPhone.	13:14:29
8	Q You've never owned an iPhone? Okay. What	13:14:31
9	type --	13:14:35
10	A I'm sorry?	13:14:35
11	Q I'm sorry. What type of smartphone do you	13:14:36
12	use?	13:14:40
13	A It's varied over the years. I've used	13:14:40
14	Samsung, LG, Motorola.	13:14:43
15	Q Okay. So have they always been Android	13:14:47
16	phones?	13:14:51
17	A Yes.	13:14:51
18	Q How did you know what to search for if	13:14:51
19	you've never seen -- you've never seen the	13:14:57
20	documents that we requested?	13:15:00
21	MS. VASQUEZ: Objection --	13:15:01
22	Q And I'm not asking -- I'm going to be	13:15:03

Transcript of Sean Bett
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1	clear. I'm not asking for communications from	13:15:05
2	your attorneys, but just asking, without getting	13:15:08
3	into that, how did you know what to search for?	13:15:11
4	MS. VASQUEZ: I'm going to object that it	13:15:14
5	assumes facts not in evidence, misstates the	13:15:17
6	testimony. He said he doesn't know whether he's	13:15:21
7	seen it, not that he didn't see it.	13:15:26
8	And I'm going to caution the witness to	13:15:31
9	the extent that the question calls for	13:15:33
10	attorney-client communications, I'm going to	13:15:35
11	instruct you not to answer. If you can answer	13:15:38
12	independent of that, then you can answer.	13:15:40
13	A On the advice of counsel, I'm not going to	13:15:45
14	answer the question.	13:15:48
15	Q Okay. Did you -- have you ever had your	13:15:49
16	iCloud account or any phones, text messages imaged	13:15:52
17	or copied to be --	13:16:00
18	MS. VASQUEZ: Objection.	13:16:02
19	Sorry. Go ahead.	13:16:05
20	MR. ROTTENBORN: -- to be reviewed -- to	13:16:06
21	be reviewed as to whether or not they contained	13:16:10
22	documents that we requested.	13:16:12

Transcript of Sean Bett
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1	MS. VASQUEZ: Assumes facts not in	13:16:14
2	evidence, misstates the testimony. He's testified	13:16:16
3	he's never had an iPhone. Therefore, he wouldn't	13:16:19
4	have an iCloud. And compound.	13:16:23
5	MR. ROTTENBORN: Sorry. If I said iCloud,	13:16:26
6	I meant cloud.	13:16:29
7	Q Have you ever had any phone or accounts or	13:16:31
8	cloud accounts, email accounts copied to be	13:16:34
9	searched for responsive documents?	13:16:37
10	MS. VASQUEZ: Vague as to copied.	13:16:43
11	MR. ROTTENBORN: Go ahead, Mr. Bett.	13:16:50
12	A Not to my knowledge, no.	13:16:52
13	Q Have you ever received any instructions to	13:16:58
14	preserve documents relating to this case, or	13:17:00
15	potentially relating to this case?	13:17:03
16	MS. VASQUEZ: To the extent that calls for	13:17:07
17	an attorney-client communication, I'm going to	13:17:09
18	instruct the witness not to answer.	13:17:11
19	MR. ROTTENBORN: If the answer is no, he	13:17:21
20	can answer because there's been no communication	13:17:24
21	and no privilege.	13:17:26
22	BY MR. ROTTENBORN:	13:17:26

Transcript of Sean Bett
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1	Q So, Mr. Bett, have you received any	13:17:27
2	instructions to preserve documents potentially	13:17:30
3	relevant to this case?	13:17:30
4	A Sir, on the advice of counsel, I'm not	13:17:35
5	going to answer --	13:17:35
6	Q You're not going to answer yes or no?	13:17:39
7	A On the advice of counsel.	13:17:41
8	MR. ROTTENBORN: And, Camille, just so	13:17:43
9	we're clear, are you instructing him not to answer	13:17:46
10	even if the answer is no? Because there's no	13:17:49
11	possible privilege if he's never received a	13:17:52
12	communication. That's -- the absence of	13:17:52
13	communication is not privileged.	13:17:52
14	MS. VASQUEZ: Right. I understand that.	13:17:54
15	No.	13:17:55
16	Mr. Bett, if the answer is no, you may	13:17:56
17	answer. If the answer is anything but no, I'm	13:18:00
18	going to advise you not to answer.	13:18:03
19	THE WITNESS: Can you please repeat the	13:18:10
20	question, Mr. Rottenborn?	13:18:11
21	BY MR. ROTTENBORN:	13:18:11
22	Q Have you ever received any instructions to	13:18:15

1	preserve documents that are potentially relevant	13:18:17
2	to this case?	13:18:19
3	A Based on attorney-client privilege and	13:18:20
4	what Ms. Vasquez has stated, I'm not going to	13:18:24
5	answer that question.	13:18:28
6	Q Do you still have -- do you have any of	13:18:30
7	your old phones or computers that you don't	13:18:37
8	currently use but that you would -- may have used	13:18:42
9	during the time of the relationship between	13:18:46
10	Mr. Depp and Ms. Heard?	13:18:48
11	A I don't.	13:18:50
12	Q When would the first time have been that	13:18:51
13	you would have had -- I'm sorry.	13:18:59
14	Just to clarify, because I think I've	13:19:01
15	asked this. I think you've answered it. But you	13:19:04
16	said around 2012, 2013, would be the first time	13:19:07
17	that you think you would have communicated with	13:19:11
18	Mr. Depp by text?	13:19:13
19	A I believe that was around when I'd started	13:19:15
20	communicating with him during texts. It could	13:19:19
21	have been a little bit later or sooner. We're	13:19:22
22	going back roughly almost 9, 10 years.	13:19:27

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1	Q Okay. Well, one of the questions I have	13:19:30
2	is, and we'll take a look at them in a minute, but	13:19:32
3	you produced texts with Mr. Depp from about April	13:19:35
4	2017 forward, but you didn't produce any texts	13:19:40
5	with Mr. Depp from before that.	13:19:43
6	And my question to you is, why is that?	13:19:45
7	A Because I couldn't find them.	13:19:47
8	Q What did you do to search for them?	13:19:49
9	A I searched --	13:19:55
10	MS. VASQUEZ: Asked and answered.	13:19:55
11	Q Go ahead.	13:20:00
12	A I searched in the Verizon cloud, and I	13:20:01
13	couldn't find any of that.	13:20:06
14	Q Did you search on your phone?	13:20:07
15	A Well, I don't have my other old phones.	13:20:09
16	So the current phone that I do have, I've only had	13:20:14
17	approximately two years, give or take.	13:20:18
18	Q When you get a phone, isn't it common	13:20:21
19	practice to upload the contents of your old phone	13:20:25
20	onto your new phone so that old texts on your old	13:20:29
21	phone will still remain on your new phone?	13:20:34
22	A That's correct.	13:20:39

1	MS. VASQUEZ: Objection. Argumentative.	13:20:39
2	Q Would your new phone have texts between	13:20:42
3	you and Mr. Depp from before you got the new	13:20:45
4	phone?	13:20:48
5	MS. VASQUEZ: Objection. Vague.	13:20:49
6	Incomplete hypothetical.	13:20:50
7	Q You can answer.	13:20:57
8	A Okay. Anytime I have communication with	13:20:59
9	Mr. Depp or the family, when I'm done with the	13:21:04
10	specific shift, their text messages get deleted so	13:21:09
11	I don't accidentally dial them while my phone is	13:21:19
12	in my pocket. So, generally, the texts that are	13:21:24
13	saved onto my phone are with my children and	13:21:27
14	fellow coworkers that I've worked with, say for	13:21:30
15	the week.	13:21:34
16	But as far as having Mr., you know, Depp's	13:21:34
17	text messages saved for a few years, I just don't	13:21:37
18	do that. As soon as our communication is done for	13:21:40
19	the day or the week, it gets deleted.	13:21:42
20	Q How long has been your practice to delete	13:21:45
21	text messages like -- in that manner?	13:21:50
22	A Anytime I work with a clientele, I delete	13:21:52

1	text messages at the end of the shift so I don't	13:21:57
2	run into the problem of accidentally dialing them.	13:21:59
3	Q Is there -- other than looking in the	13:22:13
4	cloud, is there anywhere else you searched for	13:22:16
5	text message communications between you and	13:22:22
6	Mr. Depp?	13:22:24
7	A None that I can think of.	13:22:25
8	Q So I just want to -- I want to kind of get	13:22:26
9	a little bit better understanding of your -- some	13:22:36
10	of what your job for Mr. Depp entailed.	13:22:41
11	Is it -- tell me, were you available seven	13:22:45
12	days a week?	13:22:54
13	MS. VASQUEZ: Objection. Vague as to	13:22:56
14	time.	13:22:58
O 15	Q During the time -- let's -- that's a fair	13:23:01
16	objection. And primarily I'm asking for 2010 to	13:23:04
17	the present, and at times I may limit my question	13:23:09
18	to the period of time when Mr. Depp was with Ms.	13:23:11
19	Heard.	13:23:16
20	But is it -- is it a seven-day-a-week job	13:23:16
21	when he's in town, in LA?	13:23:19
22	A Not specifically for me. When we're in	13:23:21

1	Los Angeles, there are other security personnel	13:23:24
2	that help me so I can get some time off it as	13:23:27
3	well.	13:23:31
4	Q When he was in a relationship with	13:23:31
5	ms. -- Ms. Heard, who were the security guards	13:23:34
6	that you worked with? And I think I know. I'll	13:23:37
7	name them and you tell me if I -- Jerry --	13:23:41
8	A I'm sorry? You were cut off.	13:23:46
9	Q I'm sorry. Jerry Judge?	13:23:48
10	A Yes.	13:23:51
11	Q Travis McGivern?	13:23:51
12	A McGivern, correct.	13:23:54
13	Q And then Malcolm Connolly was just when he	13:23:57
14	was overseas, right?	13:24:02
15	A Malcolm Connolly and Jerry Judge would be	13:24:06
16	in town. And depending on what Mr. Depp -- his	13:24:10
17	schedule was with premieres or events and so	13:24:14
18	forth, they would be in town briefly or sometimes	13:24:16
19	for a while, and then they would go back to the	13:24:20
20	UK.	13:24:23
21	And if Mr. Depp was going to be in town in	13:24:23
22	Los Angeles for a bit, then the LA-based team	13:24:26

1	would take care of him.	13:24:29
2	Q And who else was on the LA-based team?	13:24:31
3	A What years are you -- are you -- do you	13:24:35
4	have a specific year for me?	13:24:37
5	Q Yeah, that's a fair -- that's fair.	13:24:38
6	From 2013 to 2016, who was on the LA-based	13:24:43
7	team?	13:24:48
8	A Myself, Travis McGivern, Starling Jenkins,	13:24:48
9	Gene Arreola, Mustafa Muhammed, Leonard Damien,	13:25:15
10	Joe Delu. And there might have been Dimitri	13:25:21
11	Court.	13:25:28
12	There are some other names. I just can't	13:25:29
13	think of them right now. Because you're asking	13:25:31
14	from 2013, you know. There were some, like,	13:25:34
15	part-time gentlemen that would come in from time	13:25:36
16	to time and help out.	13:25:40
17	Q Was -- were you the head of that team	13:25:41
18	during that time period?	13:25:45
19	A No. Leonard Damien was.	13:25:46
20	Q Are you the head of it now?	13:25:58
21	A Yes.	13:26:00
22	Q When did you become the head of that	13:26:00

1 security team? 13:26:03

2 A It's very hard to say because Leonard 13:26:10

3 Damien was the head of the team -- of the LA-based 13:26:15

4 team. And there wasn't a ceremony, or nobody 13:26:20

5 stipulated, you're running the team now. It was 13:26:25

6 around, I don't know, 2016, '17, '18, where 13:26:28

7 Mr. Damien -- his sole purpose was to take care of 13:26:34

8 Mr. Depp's children. So he would handle the 13:26:37

9 children's side with a couple of guys. I would 13:26:40

10 handle Mr. Depp's end with, you know, the other 13:26:43

11 security guards. 13:26:47

12 Q So is -- obviously, one of your jobs would 13:26:50

13 be -- one of the tasks that you performed for 13:26:54

14 Mr. Depp would be to provide security, to keep him 13:26:59

15 safe, right? 13:27:02

16 A Correct. 13:27:03

VA,C 17 Q And when you were out with Mr. Depp, he 13:27:03

18 was your first priority. Your first charge was to 13:27:06

19 keep him safe, right? 13:27:10

20 MS. VASQUEZ: Objection. Vague, compound. 13:27:12

21 Q You can answer. 13:27:19

22 A When I'm around Mr. Depp, one of the top 13:27:20

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VA,C,R 1	priorities is to make sure he's safe and he gets	13:27:25
2	home safe.	13:27:30
3	Q And Mr. Depp's safety is a priority over	13:27:32
4	others that may be with Mr. Depp if he's out with	13:27:36
5	others, right?	13:27:39
6	MS. VASQUEZ: Objection. Assumes facts	13:27:41
7	not in evidence.	13:27:41
VA,C,R 8	A Well, everybody's safety is involved. It	13:27:46
9	depends on the specific circumstances. But my	13:27:50
10	priority is to make sure he is safe. That just	13:27:55
11	goes without saying.	13:28:00
12	Q Okay. Other tasks might involve picking	13:28:01
13	up food for Mr. Depp?	13:28:06
14	A Correct.	13:28:08
15	Q Picking up groceries?	13:28:08
16	A Correct.	13:28:12
17	Q Letting him into places like his	13:28:13
18	residences, because he doesn't carry keys, right?	13:28:18
19	A Correct. We're the ones who let him in.	13:28:24
20	Q And is it correct that Mr. Depp doesn't	13:28:28
21	carry keys to his residences?	13:28:32
22	A He has before where he's kept a key, but	13:28:34

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VA,C,R ₁ FSPK	from time to time he would misplace it.	13:28:38
2	Q So when he goes to his residences, you're	13:28:40
3	primarily the people that let him in?	13:28:44
4	A Correct.	13:28:47
5	Q Driving him places?	13:28:47
6	A Yes, we do drive him. Mr. Depp has driven	13:28:52
7	himself with his children to school over the	13:28:56
8	years.	13:28:59
9	Q How -- almost every time Mr. Depp leaves	13:28:59
10	one of his properties, he is being driven rather	13:29:07
11	than driving, right?	13:29:11
12	A Correct.	13:29:13
13	Q Waking him up. Is that something you	13:29:13
14	would do for him?	13:29:18
15	MS. VASQUEZ: Objection. Assumes facts	13:29:19
16	not in evidence. Vague.	13:29:21
VA,C,R ₁₇ FSPK	A I have woken him up, yes.	13:29:29
18	Q You've put him to bed before too, right?	13:29:35
19	MS. VASQUEZ: Same objections.	13:29:38
VA,C,R ₂₀ FSPK	A What do you mean by putting him to bed,	13:29:41
21	Mr. --	13:29:44
22	Q Well, when Mr. Depp was -- there have been	13:29:45

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C,R

1

times when Mr. Depp was too impaired to put

13:29:49

2

himself to bed, and you put him to bed, right?

13:29:52

3

Got him in his bed, put him to bed.

13:29:56

4

MS. VASQUEZ: Objection. Vague, assumes

13:29:59

5

facts not in evidence, argumentative.

13:30:01

C,R

6

A I mean, Mr. Depp has been impaired. I

13:30:11

7

can't think of an incident where I physically

13:30:14

8

carried him like he was my son and put him into

13:30:17

9

bed. I opened the bedroom doors for him because

13:30:20

10

the LA office -- or correction, the LA residence

13:30:24

11

-- you've got to go up several flights of stairs.

13:30:27

12

And you know, might have gotten him some water or

13:30:31

13

asked him if he needs anything. And, you know, he

13:30:34

14

lays down and I tell him good night and I'll see

13:30:37

15

him the next day.

13:30:40

16

Q And Mr. Depp doesn't wear a watch, does

13:30:42

17

he? Typically?

13:30:46

18

A He does from time to time.

13:30:47

19

Q You've -- you've -- when he's been

13:30:49

20

traveling before, you've awakened him to get him

13:30:53

21

-- or try to get him where he needs to get to on

13:30:56

22

time, right?

13:30:57

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1 MS. VASQUEZ: Objection. Assumes facts 13:30:58

2 not in evidence, vague, and argumentative. 13:30:59

R 3 A I have woken Mr. Depp before, correct. 13:31:04

4 Q When he was at his deposition in Virginia, 13:31:08

5 you were responsible for waking him up in the 13:31:10

6 hotel where he was staying in the morning, right? 13:31:13

7 A There was a group of us that actually work 13:31:15

8 him up. 13:31:18

9 Q Who else was present? 13:31:20

10 A Jason Foreman and Mark Gibbs. 13:31:22

11 Q And so you -- would you have the key -- 13:31:29

12 did you have the key to his hotel room, and you'd 13:31:32

13 walk in the room and wake him up? 13:31:35

14 A Anytime we stay at hotels, all of us have 13:31:39

15 the keys to his room. 13:31:43

16 Q You -- one of the tasks that you perform 13:31:54

17 for Mr. Depp would be to supply him with alcohol 13:31:58

18 if he wanted it, right? 13:32:01

19 MS. VASQUEZ: Objection -- sorry. 13:32:05

20 Assumes facts not in evidence. 13:32:06

21 Q You can answer. 13:32:10

R 22 A I bought him alcohol at the store, yes. 13:32:10

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R	1	Q And you've delivered drugs to him before,	13:32:14
	2	haven't you?	13:32:18
	3	MS. VASQUEZ: Objection. Assumes facts	13:32:18
	4	not in evidence. Argumentative. Vague as to	13:32:20
	5	drugs.	13:32:20
R	6	A I don't deliver drugs to anybody.	13:32:22
	7	Q You've delivered drugs to Mr. Depp before,	13:32:25
	8	haven't you, Mr. Bett?	13:32:28
	9	MS. VASQUEZ: Objection. Argumentative,	13:32:30
	10	harassing, asked and answered.	13:32:34
	11	You can answer, again, Mr. Bett.	13:32:44
R	12	A The answer is no.	13:32:47
	13	Q Your testimony under oath today is that	13:32:49
	14	you have never delivered drugs to Mr. Depp?	13:32:52
O	15	MS. VASQUEZ: Asked and answered for the	13:32:55
	16	third time. Harassing. Argumentative.	13:32:58
	17	Keep it up, and we're going to move for a	13:33:01
	18	protective order.	13:33:05
	19	Q Go ahead and answer, Mr. Bett.	13:33:07
	20	MS. VASQUEZ: For the third time,	13:33:09
	21	Mr. Bett, please answer the question.	13:33:11
	22	A No.	13:33:11

1	Q You've helped coordinate Mr. Depp's visits	13:33:23
2	by his girlfriends, right?	13:33:27
3	MS. VASQUEZ: Objection. Vague.	13:33:28
4	Compound, assumes facts not in evidence,	13:33:30
5	A What do you mean? I don't understand the	13:33:39
6	question. What do you mean by girlfriends?	13:33:40
7	Q When Mr. Depp has a romantic interest, you	13:33:46
8	helped arrange visits by the women with whom he	13:33:50
9	has a romantic relationship; correct?	13:33:56
10	MS. VASQUEZ: Objection. Vague as to	13:33:59
11	arrange visits, assumes facts not in evidence, and	13:34:01
12	vague as to time.	13:34:04
13	A Can you be more specific about arrange? I	13:34:06
14	mean, arrange can mean a whole plethora of	13:34:09
15	ideas --	13:34:09
16	Q Arrange of what? What don't you	13:34:16
17	understand about my question?	13:34:19
18	A Well, I don't understand what you mean by	13:34:20
19	arranged visits. Are you asking, have I opened up	13:34:22
20	a door? Have I said hello? I mean, I don't	13:34:25
21	understand.	13:34:29
22	Q Mr. Depp has relied on you to organize	13:34:29

1	details of logistics of visits of romantic	13:34:33
2	partners; correct?	13:34:35
3	MS. VASQUEZ: Objection. Vague. Frankly	13:34:38
4	unintelligible.	13:34:42
5	You can answer it.	13:34:45
6	A I've opened up doors for girls that are	13:34:47
7	friend that are Mr. Depp's -- that are friends	13:34:51
8	with Mr. Depp.	13:34:53
9	Q That are in romantic relationships with	13:34:54
10	Mr. Depp; correct?	13:34:57
11	MS. VASQUEZ: Objection. Vague.	13:34:59
12	A Well, what do you mean by romantic?	13:35:02
13	Q That he was in sexual relationships with,	13:35:04
14	Mr. Bett. I think you know exactly what I'm	13:35:07
15	asking.	13:35:10
16	MS. VASQUEZ: Okay. Objection.	13:35:10
17	Harassing, argumentative. Frankly,	13:35:13
18	unintelligible. I don't remember the question.	13:35:16
19	You might want to rephrase that.	13:35:18
20	Mr. Bett, if you remember the question or	13:35:20
21	understand it, feel free to answer. Otherwise --	13:35:23
22	I think you might want to rephrase it.	13:35:27

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1	MR. ROTTENBORN: I'm not going to -- I'm	13:35:31
2	not going to play the game that and Ben play, but	13:35:33
3	I'm not going to -- we're not going to -- our	13:35:33
4	communication -- this isn't a communication	13:35:33
5	between you and me.	13:35:33
6	But your objections are entirely	13:35:36
7	inappropriate. They're speaking objections and	13:35:39
8	inappropriate, and I'm just going to mark that for	13:35:41
9	the record. And I'm going to go on and question	13:35:43
10	Mr. Bett, but I'm just going to say that. And if	13:35:45
11	we need more time with the Court, then we'll ask	13:35:50
12	for it. But your -- your conduct is entirely	13:35:50
13	unprofessional and inappropriate.	13:35:53
14	MS. VASQUEZ: I think your questions are	13:35:53
15	unprofessional, harassing, and argumentative. So	13:35:54
16	you know, if you want more time to repeat the same	13:35:59
17	questions to the witness, feel free to ask the	13:36:01
18	Court for that. I don't think she's going to be	13:36:04
19	all that amused, but go ahead.	13:36:07
20	Mr. Bett, if you remember the question,	13:36:11
21	feel free to answer it -- and understand it.	13:36:12
22	BY MR. ROTTENBORN:	13:36:12

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1	Q I'll ask -- I'll ask a new question to	13:36:17
2	you, Mr. Bett.	13:36:19
3	You have -- you have done more than simply	13:36:21
4	open doors for Mr. Depp's romantic partners. In	13:36:23
5	fact, you have arranged for -- when they're	13:36:29
6	visiting him, he will text you and ask you to	13:36:31
7	arrange logistics for visits by those romantic	13:36:35
8	partners; correct?	13:36:39
9	MS. VASQUEZ: Objection. Vague as to	13:36:41
10	time, compound. Assumes facts not in evidence.	13:36:43
11	A I've gone to pick up females -- correction	13:36:46
12	-- in the singular term. I have gone to pick up	13:36:51
13	women that are Mr. Depp's friends in a vehicle.	13:36:56
14	If that's what you're asking, speaking of	13:36:59
15	logistics, yes, I've done it.	13:37:03
16	Q At Mr. Depp's request, right?	13:37:04
17	A Correct.	13:37:07
18	Q You've helped Mr. Depp arrange for --	13:37:07
19	well, strike that.	13:37:23
20	MR. ROTTENBORN: Let's pull up Exhibit	13:38:00
21	Bett 37 through Bett 64, please.	13:38:02
22	THE TECHNICIAN: Please stand by.	13:38:09

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H	1	Exhibit 2. Mr. Bett, you have control.	13:38:21
	2	THE WITNESS: Thank you. I just need to	13:38:28
	3	expand it a little. Okay.	13:38:30
	4	(BETT Exhibit 2 was marked for	13:38:30
	5	identification and is attached to the transcript.)	13:38:30
H	6	Q And, Mr. Bett, my first question for you	13:38:37
	7	is, do you agree that these are text messages to	13:38:40
	8	and from you that were part of your document	13:38:44
	9	production in this case; correct?	13:38:46
	10	MS. VASQUEZ: I'm just going to ask the	13:38:48
	11	witness to either have control, so he can scroll	13:38:51
	12	through a 28-page PDF.	13:38:55
	13	MR. ROTTENBORN: He has control.	13:38:59
	14	A Okay. Can you repeat that? I was too	13:39:01
	15	busy trying to read some of this stuff.	13:39:05
	16	Q Yeah, and I don't have questions about all	13:39:09
	17	of it. I'll direct your attention to where I have	13:39:10
	18	questions.	13:39:14
	19	But these are -- these are text messages	13:39:14
	20	to and from you that you produced in this case,	13:39:16
	21	right?	13:39:21
H	22	A That is my phone number. And it appears	13:39:22

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H	1	that's my verbiage on there, so yes, I would -- I	13:39:25
	2	would agree with that.	13:39:30
	3	Q If you could please go to entry No. --	13:39:36
	4	let's see, entry No. 277. You see how on the left	13:39:40
	5	they're kind of marked numerically?	13:39:46
	6	A Yeah, so scroll all the way down until I	13:39:49
	7	hit 277?	13:39:53
	8	Q Yeah, it's --	13:39:55
	9	A All right. Do you know roughly what page?	13:39:56
	10	Q It's four or five pages. It's probably	13:39:59
	11	like around page 20 -- I can tell you.	13:40:02
	12	A I'm in the -- I'm hitting 200 now, so I'll	13:40:04
	13	be there shortly.	13:40:09
	14	Q Yes.	13:40:11
	15	A Bear with me, sir.	13:40:18
	16	Q Sure.	13:40:21
	17	A Okay. 277?	13:40:22
	18	Q Yes.	13:40:24
	19	A All right. May I have it?	13:40:25
H	20	Q What is -- so these are a series of text	13:40:27
	21	messages between you and Mr. Depp, right?	13:40:31
	22	A Correct.	13:40:34

1	MS. VASQUEZ: Vague as to series.	13:40:35
R 2	Q What does ROAJMO mean? I see that in a	13:40:37
3	lot of them.	13:40:44
4	A Oh, it's just a term ROAJMO I created.	13:40:45
5	Q What does it mean?	13:40:48
6	A It means reach out and jerk me off.	13:40:51
7	Q And when did you create that term?	13:40:57
8	A With fellow deputies when I was on the	13:41:00
9	Sheriff's Department.	13:41:03
10	Q And I assume that -- that you're not	13:41:05
11	requesting a literal meaning of that word, right?	13:41:20
12	A Absolutely not.	13:41:25
13	Q So what does it mean?	13:41:26
14	A It's the term -- it's reach out and jerk	13:41:28
15	me off. It's trying to be fun. It's guy talk.	13:41:32
16	It's something that was done in the 90s. And it's	13:41:37
17	verbiage that I had told him about when I was on	13:41:37
18	the job, and he thought it was funny.	13:41:37
19	Q But I mean -- and I'm not trying to give	13:41:41
20	you a hard time, but I'm just trying to -- what is	13:41:42
21	it trying to convey, like --	13:41:46
22	A Just slang. Like, if you're having a bad	13:41:47

1	day, reach out and jerk me off, will you, Fred?	13:41:51
2	You know, it's one of those things.	13:41:55
R 3	Q What does Fasha, F-A-S-H-A, mean?	13:41:57
4	A He calls me that from time to time.	13:42:06
5	Q What does it mean?	13:42:10
6	A It's the character from Austin Powers	13:42:11
7	Goldmember in which Michael Meyers plays himself	13:42:14
8	as his father. And, to quote him, he goes, Fasha.	13:42:19
9	So that's what that means.	13:42:25
10	Sorry. I'm trying to be professional, but	13:42:27
11	I wanted you to have it in the context.	13:42:33
12	Q Can you just do that one more -- no, I'm	13:42:35
13	just kidding. You did me a laugh with that one.	13:42:38
14	MS. VASQUEZ: That's just hilarious.	13:42:40
R 15	Q Okay. So that's kind of what he called	13:42:50
16	you?	13:42:53
17	A He called me that -- he calls me that from	13:42:54
18	time to time, correct.	13:42:58
19	Q Okay. Can you go to -- to page or entry	13:42:59
20	253, please?	13:43:03
21	A Okay. All righty.	13:43:05
22	Q What does he mean in that where he says, I	13:43:08

1	await the turtle?	13:43:19
2	MS. VASQUEZ: Objection. Calls for	13:43:24
3	speculation.	13:43:26
4	A One of the security personnel, Travis	13:43:27
5	McGivern, he has a very bald shiny head and he's	13:43:31
6	short, and he was given the nickname Cecil Turtle.	13:43:38
7	Therefore, we all have called him the turtle over	13:43:44
8	the years he has worked there.	13:43:47
9	Q Okay. In the one above that you say --	13:43:49
10	and do you agree with me that where it says from	13:43:52
11	and then it lists your number and then Sean	13:43:59
12	Security Bett, that those are texts from you, and	13:44:03
13	that where it lists to, your number and then Sean	13:44:07
14	Security Bett, that those are texts to you.	13:44:11
15	Are we on the same page there?	13:44:14
16	A We are.	13:44:16
17	Q In the text right above that what does MO	13:44:16
18	mean?	13:44:19
19	A Roaj -- well, I think he was referring to	13:44:23
20	ROAJMO fucking MO. So instead of saying ROAJMO,	13:44:26
21	fucking ROAJMO, he just took the last syllable of	13:44:32
22	MO.	13:44:38

1	Q Got it. Okay.	13:44:38
2	A I'm only speculating. I don't know what	13:44:39
3	was in his head when he typed that.	13:44:42
4	Q Few of us could.	13:44:44
5	In entry 249 do you see the reference to	13:44:48
6	someone named Rochelle?	13:44:56
7	A I do.	13:44:58
8	Q Who is that?	13:44:59
9	A A girl that's a friend of his.	13:45:00
10	Q Mr. Depp's been romantically involved with	13:45:05
11	Rochelle, right?	13:45:14
12	MS. VASQUEZ: Objection. Vague. Assumes	13:45:16
13	facts not in evidence. Calls for speculation.	13:45:19
14	A What Mr. Depp does in his living room or	13:45:24
15	bedroom, he doesn't convey the details. So I've	13:45:29
16	never inquired to whom he's had any sexual	13:45:33
17	relationships with, and he's never given me -- you	13:45:39
18	know, he's never done the same as well.	13:45:43
19	Q So are -- did -- is your answer -- well,	13:45:45
20	let me ask it this way.	13:45:50
21	Whether from Mr. Depp or elsewhere, do you	13:45:52
22	have personal knowledge of Rochelle being a	13:45:56

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IU	1	romantic partner of Mr. Depp?	13:46:00
	2	A I have no personal, firsthand knowledge of	13:46:02
	3	him having a sexual relationship with her.	13:46:06
	4	Q What's her last name?	13:46:09
	5	A That, I can't remember at this time.	13:46:15
	6	Q Is it common for Mr. Depp to use a sauna?	13:46:22
	7	A Yes.	13:46:26
	8	Q What would you do in the sauna?	13:46:26
	9	MS. VASQUEZ: Objection. Calls for	13:46:31
	10	speculation.	13:46:33
	11	A I don't know what he does in the sauna	13:46:40
	12	because I'm not in there with him.	13:46:41
	13	Q Mr. Depp would smoke in the sauna, right?	13:46:44
	14	MS. VASQUEZ: Objection. Vague.	13:46:51
	15	A Again, I'm not in there with him, so I	13:46:52
	16	don't know what he does.	13:46:56
	17	Q Does Mr. Depp -- does he use Altoids, that	13:47:07
	18	you know of?	13:47:11
	19	A Yes, he -- we all do.	13:47:12
	20	Q He likes -- likes breath mints?	13:47:13
	21	A Yes. We all do.	13:47:19
	22	Q Can you go to 241, please?	13:47:20

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66

H,R,
FSPK

1

A Okay.

13:47:47

2

Q Who's Geno?

13:47:47

3

A Geno is a slang term -- or not a slang

13:47:52

4

term, but a name for Gene Arreola that used to be

13:47:56

5

a security guard for him.

13:48:00

6

Q Okay. Do you have any understanding of

13:48:03

7

what Mr. Depp meant when you said, Geno is there,

13:48:05

8

what you need, and he texted you, business with

13:48:11

9

the Kardashians?

13:48:13

10

A I have no idea.

13:48:17

11

Q You have no idea?

13:48:19

12

MS. VASQUEZ: Asked and answered.

13:48:29

H,R,
FSPK

13

A By reading it, maybe the Kardashians were

13:48:32

14

coming over after I left. I don't know.

13:48:37

15

Q Have the Kardashians ever been over to his

13:48:40

16

place when you've been around?

13:48:45

17

A Not that I'm aware.

13:48:46

18

Q Have they ever been over to his place when

13:48:48

19

you haven't been around, that you know of?

13:48:51

20

A Not that I'm aware of.

13:48:54

21

Q And yet on 238 you respond to him, you

13:48:56

22

used all of them oh faacha, right?

13:49:00

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H, R,
FSPK

1

A That's what it says, yes.

13:49:03

2

Q So you didn't say at the time that you

13:49:05

3

didn't understand what he was talking about,

13:49:11

4

right?

13:49:13

5

MS. VASQUEZ: Objection. Vague.

13:49:14

6

Argumentative.

13:49:17

7

Might be helpful to the witness if you

13:49:20

8

read all the messages from that time period to get

13:49:23

9

some context, but --

13:49:26

10

MR. ROTTENBORN: That's an inappropriate

13:49:30

11

objection.

13:49:32

12

Q But you can answer, Mr. Bett.

13:49:32

H, R,
FSPK

13

A I have no idea. I mean, this is from 2017

13:49:35

14

and you're asking me the details about the

13:49:39

15

conversation, which -- it's vague. But I have no

13:49:42

16

idea what we were talking about.

13:49:44

17

It could have been a joke maybe we were

13:49:46

18

talking about earlier. I can't tell you. It was

13:49:48

19

so long ago.

13:49:51

20

Q You said you used all of them.

13:49:52

21

What is the them you were referring to?

13:49:54

22

A Again, I don't --

13:49:57

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1 MS. VASQUEZ: Objection. Vague. Calls 13:49:57
2 for speculation. 13:49:58

3 THE WITNESS: Sorry. 13:50:05

H,R, 4 A I don't know. This was so long ago. I 13:50:07
FSPK 5 can't tell you. 13:50:09

6 Q Okay. Do you see in 2 -- or 2-- you can 13:50:10
7 kind of take a look at 233 through 236, please. 13:50:17

8 A Okay. 13:50:21

9 Okay. 13:50:42

10 Q Mr. Depp is not requesting Altoids, right? 13:50:44
11 He's requesting drugs that are in an Altoids can; 13:50:47
12 correct? 13:50:51

13 MS. VASQUEZ: Objection. Assumes facts 13:50:52
14 not in evidence. The document speaks for itself. 13:50:54
15 Misstates the testimony and record. 13:50:59
16 Argumentative. 13:50:59

H,R, 17 A It says here he's requesting cinnamon 13:51:00
FSPK 18 Altoids. 13:51:03

19 Q I understand that what it says. 13:51:04

20 Over the course of your time in law 13:51:06
21 enforcement, do you understand that communications 13:51:08
22 regarding drugs often use other words for the 13:51:11

IO,R, FSPK	1	drugs themselves? Code words, right?	13:51:14
	2	MS. VASQUEZ: Objection. Assumes facts	13:51:16
	3	not in evidence. I mean, he's not testifying as	13:51:18
	4	an expert.	13:51:20
IO,R, FSPK	5	A I know with drugs --	13:51:23
	6	MR. ROTTENBORN: Inappropriate --	13:51:25
IO,R, FSPK	7	THE WITNESS: -- there can be slang	13:51:26
	8	terminology used, but I - in my 14 years in the	13:51:30
	9	Sheriff's Department, there's never been slang	13:51:34
	10	referred to as cinnamon Altoids.	13:51:37
	11	Q And did -- Mr. Depp used slang words for	13:51:40
	12	drugs, right?	13:51:43
	13	MS. VASQUEZ: Objection. Assumes facts	13:51:45
	14	not in evidence.	13:51:45
IO,R, FSPK	15	A We've used the term for marijuana, wacky	13:51:53
	16	tobacky.	13:51:53
	17	Q And he's used slang words for other drugs,	13:52:00
	18	too, right?	13:52:04
	19	A He could have, but I just -- I -- you	13:52:05
	20	know, I can't think of what they are right now.	13:52:08
	21	Q Can you think of any?	13:52:10
	22	A Not off the top of my head, no.	13:52:12

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R, VA	1	Q Mr. Depp has a long history of drug abuse,	13:52:17
	2	right?	13:52:21
	3	MS. VASQUEZ: Objection.	13:52:21
	4	Q Would you agree with that?	13:52:24
	5	MS. VASQUEZ: Vague as to abuse. Assumes	13:52:26
	6	facts not in evidence.	13:52:26
R, VA	7	A Mr. Depp has mentioned in his lifetime he	13:52:32
	8	has used drugs.	13:52:35
	9	Q In fact, in the time -- during the time	13:52:37
	10	that you have been working for him, Mr. Depp has	13:52:40
	11	abused cocaine; correct?	13:52:43
	12	MS. VASQUEZ: Objection. Calls for	13:52:45
	13	application. Assumes facts not in evidence.	13:52:48
	14	This witness has already testified he has	13:52:49
	15	never provided drugs to Mr. Depp.	13:52:52
	16	MR. ROTTENBORN: Inappropriate speaking	13:52:55
	17	objection.	13:52:57
	18	Q Mr. Depp -- I'm asking you -- this is the	13:52:57
	19	question.	13:52:57
R, VA	20	During the time that you've been working	13:53:01
	21	for him, Mr. Depp has abused cocaine; correct?	13:53:04
	22	MS. VASQUEZ: Same objections.	13:53:09

H, R,
FSPK

1

A I haven't seen Mr. Depp use cocaine, so I

13:53:11

2

can't testify to whether he's abused it or not.

13:53:15

3

Q You have knowledge that he's used it;

13:53:18

4

correct.

13:53:21

5

MS. VASQUEZ: Objection. Calls for

13:53:21

6

speculation. Misstates the testimony.

13:53:23

H, R,
FSPK

7

A He has stated in open court that he has

13:53:27

8

used drugs in his lifetime.

13:53:29

9

Q Is it -- Have you ever seen Mr. Depp use

13:53:32

10

drugs?

13:53:35

O

11

MS. VASQUEZ: Objection. Vague as to

13:53:35

12

drugs. Asked and answered.

13:53:37

13

A I have not seen him, in my presence, use

13:53:40

14

illegal drugs.

13:53:44

AA

15

Q Not once?

13:53:45

16

MS. VASQUEZ: Asked and answered.

13:53:48

17

A I have not seen Mr. Depp, in my presence,

13:53:50

18

use illegal drugs.

13:53:53

R,
NC

19

Q You have heard from Mr. Depp that he's

13:53:55

20

used illegal drugs? He's told you that, right?

13:53:58

21

A He has stated in open court in his

13:54:02

22

lifetime he has used illegal drugs.

13:54:05

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H,R,
FSPK

1
2
3
4
5
6
7
8
9
10
11
12

Q And I'm not asking about open court. I'm
asking about conversations that Mr. Depp has had
with you.
He's told you he's used cocaine; correct?
A In his lifetime, he has told me that,
correct.
Q And Mr. Depp has told you that he's used
MDMA; correct?
A I can't confirm or deny that. I can't
remember.
Q And he's told you that he's used -- abused
pills; correct?

13:54:09
13:54:11
13:54:14
13:54:15
13:54:18
13:54:21
13:54:21
13:54:25
13:54:27
13:54:32
13:54:32
13:54:37

13

MS. VASQUEZ: Objection. Compound, vague.

13:54:38

H,R,
FSPK

14
15
16
17
18

A He has stated that he has used, you know,
pills in his lifetime. Correct.
Q And you have witnessed Mr. Depp impaired
by illegal drugs numerous times; is that correct,
Mr. Bett?

13:54:47
13:54:50
13:54:53
13:54:57
13:55:07

19

MS. VASQUEZ: Objection. Compound, vague.

13:55:09

20

Assumes facts not in evidence.

13:55:11

H,R,
FSPK

21
22

A I have seen Mr. Depp impaired. As far as
what he's been impaired under, I couldn't tell you

13:55:12
13:55:16

R, FSPK 1	because I don't have access to bloodwork and so	13:55:19
2	forth. So it could have been anything.	13:55:24
3	Q You have had access to drugs that you have	13:55:26
4	personally delivered to Mr. Depp, haven't you?	13:55:28
5	MS. VASQUEZ: Okay. Objection. Asked and	13:55:31
6	answered, I think it's the fourth time.	13:55:33
7	Argumentative. Harassing.	13:55:39
R, FSPK 8	A I've picked up prescription medication at	13:55:41
9	pharmacies for Mr. Depp.	13:55:44
10	Q So you're changing your testimony from	13:55:50
11	earlier where you said you had never delivered	13:55:53
12	drugs to Mr. Depp; is that -- is that right? So I	13:55:57
13	want to make sure we're clear on the record here.	13:56:00
14	MS. VASQUEZ: Objection. Argumentative.	13:56:02
15	Harassing. Misstates the prior testimony.	13:56:04
R, FSPK 16	A The question I believe was, unless I'm	13:56:07
17	mistaken, was illegal drugs. Prescription drugs	13:56:10
18	are legal. He has a prescription.	13:56:13
19	Q Mr. Depp -- the record will -- I think I	13:56:19
20	said drugs, but the record will be what it will	13:56:23
21	be.	13:56:25
R, FSPK 22	Mr. Depp has abused prescription drugs	13:56:26

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R, FSPK, VA	1	during the time that you've worked with him,	13:56:29
	2	hasn't he?	13:56:31
	3	MS. VASQUEZ: Objection. Vague. Calls	13:56:32
	4	for speculation.	13:56:34
R, FSPK, VA	5	A Mr. Depp has taken prescription drugs that	13:56:37
	6	he has prescriptions for.	13:56:40
	7	Q And you would agree that people can abuse	13:56:42
	8	drugs that they have prescriptions for; correct?	13:56:46
	9	MS. VASQUEZ: Objection. Incomplete	13:56:48
	10	hypothetical.	13:56:51
R, FSPK, VA	11	A Are you asking for my opinion?	13:56:52
	12	Q Yeah.	13:56:57
	13	A People can abuse anything, correct.	13:56:57
	14	Q And Mr. Depp has abused prescription drugs	13:56:59
	15	that he had prescriptions for; correct?	13:57:02
	16	MS. VASQUEZ: Objection. Asked and	13:57:04
	17	answered. Calls for a conclusion. Calls for	13:57:05
	18	speculation.	13:57:13
	19	Q You can answer.	13:57:16
	20	A I'm sorry. Can you repeat the question	13:57:18
	21	again?	13:57:20
R, FSPK, VA	22	Q Mr. Depp has abused prescription drugs	13:57:21

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R, FSPK, VA	1	that he has prescriptions for; correct?	13:57:24
	2	MS. VASQUEZ: Same objections.	13:57:27
R, FSPK, VA	3	A Mr. Depp has taken prescription	13:57:29
	4	don't understand what you mean by abuse	13:57:31
	5	Q He has used them to get high rather than	13:57:37
	6	for the use that they're intended for; correct?	13:57:42
	7	MS. VASQUEZ: Objection. Calls for	13:57:46
	8	speculation. Assumes facts not in evidence.	13:57:47
	9	Asked and answered. Argumentative.	13:57:50
	10	A I have seen Mr. Depp take his prescription	13:57:57
	11	drugs that were given to him. I don't understand	13:58:00
	12	-- by he abuses them. He takes them. I take an	13:58:06
	13	aspirin every day. Am I abusing aspirin? Maybe.	13:58:10
	14	I don't know.	13:58:14
	15	Q What drugs -- what prescription drugs have	13:58:15
	16	you seen Mr. Depp take, personally?	13:58:18
	17	A I -- I don't know the names of them	13:58:19
	18	because I don't check them. I've seen him have a	13:58:22
	19	cup of coffee or water and take something that's	13:58:26
	20	out of a prescription bottle. So I don't -- I've	13:58:30
	21	never asked him, what have you taken, Mr. Depp --	13:58:33
	22	or Johnny.	13:58:37

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1 Q Have you seen him take oxycodone? 13:58:38

2 A Again, I don't know what he takes when he 13:58:42
3 opens up a prescription bottle. 13:58:44

4 Q Right, and that wasn't my question. My 13:58:46
5 question was very direct, very simple. 13:58:49

6 Have you seen him take oxycodone? 13:58:51

7 MS. VASQUEZ: Asked and answered. 13:58:55
8 Harassing. 13:58:56

9 A I don't know what I've seen him take 13:58:57
10 because I don't know the product name of what he's 13:59:00
11 taking. So you're asking me to speculate. I 13:59:02
12 don't know what he's taken. He's never shown me a 13:59:05
13 pill and said, guess what I'm taking. So, 13:59:08
14 therefore, I don't know. 13:59:12

R 15 Q He's asked you to get more pills, certain 13:59:13
16 types before, right? 13:59:18

17 MS. VASQUEZ: Objection. Vague. 13:59:19

R 18 A He's asked me to go to the pharmacy and 13:59:21
19 pick up his prescription. 13:59:23

20 Q And you've done that for him, right? 13:59:26

21 A Correct. 13:59:28

22 Q And you've also picked up pills for 13:59:29

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R, FSPK	1	Mr. Depp that you didn't pick up from the	13:59:33
	2	pharmacy, right?	13:59:38
	3	MS. VASQUEZ: Objection. Asked and	13:59:40
	4	answered for the fifth time, and vague.	13:59:41
R, FSPK	5	A I've picked up pills from the pharmacy.	13:59:45
	6	Q You've picked up drugs for Mr. Depp from	13:59:51
	7	Nathan Holmes and Stephen Dueters; correct?	13:59:56
	8	MS. VASQUEZ: Objection. Vague, asked and	13:59:59
	9	answered. Assumes facts --	14:00:02
R, FSPK	10	A I've picked up prescription pills from the	14:00:05
	11	pharmacy. If Stephen Dueters or Nathan Holmes had	14:00:08
	12	his prescription pills with them and I'm just	14:00:12
	13	giving them to them because they're off running	14:00:16
	14	errands or whatever, yes. Have I done that? I	14:00:20
	15	have.	14:00:20
	16	Q You've picked up -- Mr. Depp uses, or has	14:00:23
	17	used during the time you've been employed with	14:00:26
	18	him, he's used Quaaludes, right?	14:00:29
	19	MS. VASQUEZ: Objection. Calls for	14:00:32
	20	speculation.	14:00:34
R, FSPK	21	A I don't know what he's used, again, out of	14:00:35
	22	those prescription bottles.	14:00:37

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H,R, FSPK	1	Q And I'm not asking about prescription	14:00:41
	2	bottles. I'm asking again, Mr. Depp, during the	14:00:43
	3	time you've worked for him, has used Quaaludes,	14:00:47
	4	right?	14:00:50
	5	MS. VASQUEZ: Objection. Asked and	14:00:51
	6	answered. Calls for speculation.	14:00:52
H,R, FSPK	7	A I don't know if he's used them or not.	14:00:54
	8	I'm not with him 24 hours a day in his residence.	14:00:56
	9	Q You've been around him when he's used	14:01:00
	10	them; correct?	14:01:03
	11	MS. VASQUEZ: Asked and answered.	14:01:04
H,R, FSPK	12	A I've been around Mr. Depp a lot. I don't	14:01:07
	13	know what he has used or what he hasn't.	14:01:09
	14	Q In fact, you've had communications with	14:01:13
	15	Ms. Heard about Mr. Depp's use of Quaaludes,	14:01:16
	16	right?	14:01:22
	17	MS. VASQUEZ: Objection. Is assumes facts	14:01:22
	18	not in evidence.	14:01:22
H,R, FSPK	19	A I can't say I've had a conversation with	14:01:29
	20	Ms. Heard about Mr. Depp using Quaaludes.	14:01:31
	21	Q You can't say one way or the other?	14:01:35
	22	A I can't, no.	14:01:37

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H,R, FSPK	1	Q And can you say one way or the other	14:01:38
	2	whether you've had conversations with Ms. Heard	14:01:41
	3	about Mr. Depp's use of illegal drugs or abuse of	14:01:46
	4	prescription drugs?	14:01:52
	5	MS. VASQUEZ: Objection. Compound.	14:01:53
H,R, FSPK	6	A I can't say either way.	14:01:55
	7	Q It's possible?	14:01:56
	8	MS. VASQUEZ: Objection. Asked and	14:01:57
	9	answered.	14:01:57
H,R, FSPK	10	A Anything's possible. But I can't say	14:02:00
	11	either way.	14:02:02
	12	Q Go to entry 200 on the texts, please.	14:02:05
	13	A Okay.	14:02:26
	14	Q This is a text from Mr. Depp to you where	14:02:26
	15	he said, in part, steaks were excellent, a couple	14:02:29
	16	bottles of perfect wine, we then pounded an entire	14:02:36
	17	bottle of tequila, then the savagery commenced,	14:02:41
	18	good morning.	14:02:41
	19	Do you see that?	14:02:49
	20	A Yes.	14:02:50
	21	Q This is from September 10th, 2017, right?	14:02:50
	22	A According to the time stamp, correct.	14:02:53

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H,R, FSPK	1	Q Do you know where this was?	14:02:57
	2	MS. VASQUEZ: Objection. Vague.	14:02:58
H,R, FSPK	3	A Well, it would have been in Los Angeles,	14:03:02
	4	presumably either at the Sweetzer address or the	14:03:06
	5	penthouse/Eastern Columbia building, downtown Los	14:03:10
	6	Angeles.	14:03:10
	7	Q Well, I guess my question -- if you go one	14:03:16
	8	above it, you said, I prevented them from calling	14:03:17
	9	po-po. I'm glad you had fun. You mean dinner in	14:03:19
	10	room or restaurant.	14:03:20
	11	So your reference to room or restaurant	14:03:21
	12	made me wonder if that was somewhere that he was	14:03:24
	13	traveling to?	14:03:26
	14	A Oh, let me see here.	14:03:27
	15	Q I just wondered if you remember.	14:03:29
	16	A Oh, okay.	14:03:31
	17	MS. VASQUEZ: That's why, Mr. Bett --	14:03:38
	18	A Well, I --	14:03:38
	19	MS. VASQUEZ: -- I'll just instruct you to	14:03:40
	20	read the text messages in that chain before	14:03:42
	21	answering questions.	14:03:45
	22	MR. ROTTENBORN: That's an inappropriate	14:03:46

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1 instruction, Camille. 14:03:48

2 MS. VASQUEZ: It's not inappropriate. 14:03:49

3 You're asking him about a document that's 28 pages 14:03:51

4 long with entries -- about 20 entries per page. 14:03:54

5 And you're asking him about one text message. 14:03:56

6 It's not inappropriate. What you're doing is 14:03:56

7 inappropriate. 14:03:58

8 MR. ROTTENBORN: Not -- not at all. 14:03:58

9 BY MR. ROTTENBORN: 14:03:58

H,R, 10 Q Mr. Bett, what -- I'm just asking, do you 14:04:01
FSPK

11 remember where this was? 14:04:05

12 A I do now. 14:04:05

13 Q Where -- where was it? 14:04:07

14 A This was at -- it was in Montecito or 14:04:12

15 Santa Barbara. It was like a country report place 14:04:17

16 that he was at for the weekend. 14:04:20

17 Q And you said you prevented them from 14:04:22

18 calling po-po. Is that short for police? 14:04:28

19 A Correct. 14:04:32

20 Q And who was them? The -- the -- the 14:04:33

H,R, 21 staff? 14:04:38
FSPK

22 A The -- the front desk. He had a -- a very 14:04:39

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H, R,
FSPK,
IO

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lovely three-bedroom house suite that was like a
private bungalow, and it had a swimming pool, and
he was outside with the music playing.
So the guests -- or correction, the front
desk had called me to say that the neighbors were
complaining that his music was loud. And so I
just, you know, went up there and told him you,
got to turn the music down. Left it at that.
Q And Mr. Depp was intoxicated when you went
up there and told him that?

MS. VASQUEZ: Objection. Vague. Calls
for speculation.

H, R,
FSPK,
IO

A He'd been drinking. I mean, I didn't do
any field sobriety tests. I didn't have a
Breathalyzer. I didn't get close enough to smell
the presence of alcohol emitting from breath and
person. But there were drinks glasses around, so
presumably he had been drinking.

Q Mr. Depp often used the word savagery for
-- as a euphemism for a bender or getting drunk,
right?

MS. VASQUEZ: Objection. Calls for

14:04:46
14:04:50
14:04:53
14:04:56
14:04:59
14:05:03
14:05:06
14:05:08
14:05:11
14:05:15
14:05:16
14:05:18
14:05:21
14:05:24
14:05:28
14:05:31
14:05:34
14:05:38
14:05:40
14:05:46
14:05:51
14:05:52

1 speculation. Assumes facts not in evidence. 14:05:54

2 A I mean, he's -- I've never asked him, what 14:05:56

3 do you mean by savagery? He could say a lot of 14:05:58

4 things. That the plane ride coming in in windy, 14:06:02

5 rainy conditions was savagery. He could say, 14:06:02

6 jeez, we were on set last night, 18 hours of 14:06:04

7 savagery. 14:06:07

8 I think it's just another term that he 14:06:09

9 uses when it's an interesting or exciting or 14:06:12

10 death-defying day. 14:06:16

R,FSPK 11 Q And you've delivered marijuana to Mr. Depp 14:06:18

12 before, right? 14:06:21

13 MS. VASQUEZ: Objection. Vague. Assumes 14:06:23

14 facts. 14:06:23

R,FSPK 15 A I have because he had it legally through 14:06:27

16 the medical marijuana card. 14:06:30

17 Q Okay. But you -- you've -- you've -- 14:06:35

R,FSPK 18 where would he get the marijuana, or where would 14:06:39

19 you procure it from before you delivered it to 14:06:41

20 him? 14:06:46

21 A They, in Hollywood -- or correction, West 14:06:46

22 Hollywood, they have several delivery services of 14:06:53

R, FSPK 1

medical marijuana that they, you know -- as long

14:06:57

2

as you have a medical marijuana card, they have a

14:07:00

3

service from one of the vendors that are around

14:07:03

4

the West Hollywood and Beverly Hills area that

14:07:06

5

will bring it to your residence. Because they

14:07:09

6

have a lot of -- according to them, a lot of high

14:07:12

7

profile clients. And, obviously, you know, he's

14:07:15

8

not going to go into a medical marijuana shop and,

14:07:18

9

you know, buy some marijuana.

14:07:21

10

Q Right. Right. So they would deliver it,

14:07:22

11

and then you would get it and deliver the -- the

14:07:24

12

marijuana to him?

14:07:27

13

A Correct.

14:07:28

14

Q Is it wrote your testimony that each and

14:07:28

15

every time you delivered marijuana to Mr. Depp, it

14:07:31

16

came legally through a marijuana shop?

14:07:34

17

A Correct.

14:07:37

18

Q And who would order it? You?

14:07:37

19

A Yes. I created an account where you could

14:07:40

20

call or go online. And they have all our

14:07:47

21

information, and they would deliver it that day.

14:07:51

22

Q And sometimes Stephen Dueters or Nathan

14:07:53

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R, FSPK 1 Holmes would give you a package of marijuana to 14:08:01
2 deliver to him, right? 14:08:04

3 MS. VASQUEZ: Objection. Assumes facts. 14:08:06
4 Compound. 14:08:14

R, FSPK 5 A Well, if there's any marijuana being 14:08:15
6 delivered, it would have been through one of those 14:08:17
7 services. So it's possible because they -- we 14:08:20
8 all have the contract information, that they could 14:08:22
9 have ordered it. I gave it to them. 14:08:25

10 Q Well, you -- if -- if Nathan Holmes or 14:08:28
11 Stephen Dueters or someone else got drugs, legal 14:08:31
12 or illegal, to give to you to give Mr. Depp, you 14:08:36
13 don't have any knowledge of where they got the 14:08:39
14 drugs from, right? 14:08:41

15 MS. VASQUEZ: Objection. Incomplete 14:08:42
16 hypothetical. Assumes facts. Compound. 14:08:44

R, FSPK 17 A Well, I don't know that Stephen Dueters or 14:08:48
18 Nathan Holmes gave me illegal drugs. They're not 14:08:52
19 giving me drugs in a paper bag. They're not 14:08:56
20 giving me drugs in a cellophane, you know, rock 14:08:59
21 cocaine container. They're giving me a package 14:09:02
22 that comes from a legitimate place that we -- that 14:09:06

R, FSPK	1	they would have ordered the marijuana from and/or	14:09:08
	2	the prescription drugs. The prescription pills	14:09:11
	3	would have come from the pharmacies that his	14:09:14
	4	doctors have accounts with.	14:09:17
	5	Q You don't know any -- as you sit here	14:09:20
	6	today, you don't have any personal knowledge where	14:09:22
	7	any other party other than you would have gotten	14:09:26
	8	drugs for Mr. Depp from; correct?	14:09:28
	9	A Correct.	14:09:32
	10	Q Can you go to page -- or entry 74? Yeah,	14:09:32
	11	entry 74, please.	14:09:40
	12	A Okay.	14:09:51
R, FSPK	13	Q And read whatever you need to read for	14:09:52
	14	context, but in entry 73 Mr. Depp is saying, the	14:09:55
	15	NOT DRUGS is down there. And then above that he	14:10:01
	16	says, what's a boy to do, right?	14:10:04
	17	A Okay. What's a boy to do is on top it of	14:10:07
	18	it, so --	14:10:22
	19	Q Right.	14:10:23
	20	A My thing's freezing. Let me scroll up to	14:10:24
	21	72.	14:10:28
	22	Q Sure.	14:10:29

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1 A Okay. 72 is what's a boy to do. And 14:10:29

2 then, the not drugs is down there. Okay. 14:10:32

3 Which -- 14:10:35

4 Q So I think you have to read them -- the 14:10:36

5 ones at the bottom of the page are -- are farther 14:10:39

6 back in time if you look at the time stamps. So 14:10:42

7 reading them up brings us closer to present. 14:10:45

8 A Okay. 14:10:49

R,FSPK9 Q So he's saying -- the not drugs is down 14:10:49

10 there. What's a boy to do in 72. And then in 70 14:10:56

11 -- 71, you're saying -- you say try to -- trying 14:11:01

12 to help, daddy. 14:11:03

13 Do you see that? 14:11:05

14 A Yeah, I see it. 14:11:05

15 Q It was pretty common for you to refer to 14:11:07

16 him as Daddy? 14:11:10

17 A Well, I call him daddy, daddio. And vice 14:11:11

18 versa. 14:11:16

19 Q And what you're conveying in 71 is that 14:11:16

20 you're trying to help remedy his situation of not 14:11:20

21 having drugs at that time, right? 14:11:22

22 MS. VASQUEZ: Objection. Assumes facts 14:11:24

1 not in evidence. Calls for speculation. 14:11:27

2 Misstates the document. 14:11:29

R, FSPK 3 A I don't know what I was trying to say 14:11:34

4 here. There could be -- there could be a lot of 14:11:36

5 reasoning for this. I mean, this is back from 14:11:38

6 2017, so -- or 2019. This is, you know -- it's 14:11:41

7 the context of it. 14:11:45

8 Q What are you trying to help with? 14:11:48

9 MS. VASQUEZ: Calls for speculation. 14:11:51

R, FSPK 10 THE WITNESS: Again, I don't know, you 14:11:52

11 know. 14:11:52

12 Q Okay. 14:11:55

13 A I don't know what the not drugs means. I 14:11:56

14 don't know if he's referring to -- to marijuana. 14:11:58

15 I don't know if he's referring to his prescription 14:12:00

16 pills, that he ran out of a specific one. I don't 14:12:03

17 know. 14:12:06

18 Q Okay. 14:12:06

19 MR. ROTTENBORN: All right. Can you pull 14:12:23

20 up Exhibit Dep 7940, please? 14:12:26

21 THE TECHNICIAN: Please stand by. 14:12:34

22 MS. VASQUEZ: Not to interrupt your flow, 14:12:36

1 Ben, but if we could take a short five-minute 14:12:39

2 break sometime soon, that would be great. 14:12:45

3 MR. ROTTENBORN: Yeah, no problem. Let me 14:12:48

4 -- let me just ask about this exhibit -- . 14:12:50

5 MS. VASQUEZ: Sure. 14:12:51

6 MR. ROTTENBORN: -- and then I think we're

7 going to be at a stopping point. Thanks.

FSPK, H 8

THE TECHNICIAN: Exhibit 3.

9 THE WITNESS: Okay. I'm going to have to

10 expand it a little. Bear with me.

11 (BETT Exhibit 3 was marked for

12 identification and is attached to the transcript.)

13 BY MR. ROTTENBORN:

14 Q Yeah, and I'll represent to you, Mr. Bett,

15 that this is -- what I'm going to ask you about is 14:12:53

16 a text that you were not on. Okay? It's between 14:12:56

17 -- I don't believe -- Mr. Depp and some third 14:13:02

18 parties. But I just had one question. It's entry 14:13:04

19 305. 14:13:08

20 A You said 305? 14:13:10

21 Q Yeah. 14:13:13

22 A Okay. The mouse is kind of -- 14:13:15

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1 Q Yeah. 14:13:16

2 A Somebody's scrolling. Oh, somebody's 14:13:17

3 doing it for me. I got it. Oh, there we go. 14:13:21

4 Okay. 305. 14:13:30

R, FSPK, 5 Q Yeah, and I just have -- again, I fully 14:13:32
H

6 recognize you're not on this text. But the text 14:13:38

7 is from Mr. Depp to Nathan Holmes, I believe Chris 14:13:41

8 Dembrowski, and some other people -- someone named 14:13:49

9 Richard Tac. And it says, hi...why didn't you ask 14:13:52

10 Sean to pick things up before we got here? I need 14:13:57

11 the Xanax and the inspiration. Why? Must have. 14:14:00

12 My question for you is, do you know what 14:14:05

13 Mr. Depp is referring to there where he says, I 14:14:07

14 need the inspiration? 14:14:12

15 MS. VASQUEZ: Objection. Calls for 14:14:14

16 speculation. 14:14:16

R, FSPK, 17 A I couldn't tell you what he was thinking. 14:14:23
H

18 Q Was that a euphemism that Mr. Depp used 14:14:26

19 for drugs? 14:14:30

20 MS. VASQUEZ: Objection. Assumes facts. 14:14:31

21 Calls for speculation. 14:14:36

R, FSPK, 22 A He's used that term for, you know, so many 14:14:37
H

R, FSPK,
H

1 things. I mean, it's, you know -- I -- according
2 -- if you're asking me to read this, the 305, he's
3 saying he needs Xanax. So, in the context of that
4 specific conversation as what I'm reading, he
5 needs Xanax and the inspiration. So what he was
6 thinking in his head, I couldn't tell you, but I'm
7 just reading what the text says. He needs Xanax.

8 Q Did you ever hear him refer to drugs as
9 the inspiration?

10 A I couldn't say either way. I mean, it
11 doesn't ring a bell offhand. But I mean, it's
12 possible.

13 Q Okay.

14 MR. ROTTENBORN: Why don't we take a
15 break.

16 THE WITNESS: Okay.

17 MS. VASQUEZ: Can we take, like, a 5 to
18 7-minute break?

19 MR. ROTTENBORN: Sure. Why don't we just
20 say 10?

21 THE WITNESS: 2:25. Thank you.

22 MR. ROTTENBORN: 2:25, yes.

14:14:42

14:14:45

14:14:52

14:14:56

14:14:59

14:15:01

14:15:05

14:15:09

14:15:12

14:15:13

14:15:15

14:15:18

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1	THE VIDEOGRAPHER: We are now going off	14:15:33
2	the record. The time is 2:15.	14:15:34
3	(Whereupon, there was a recess in	14:18:07
4	the proceedings.)	14:18:07
5	THE VIDEOGRAPHER: We are now back on the	14:27:19
6	record. The time is 2:27.	14:27:21
7	BY MR. ROTTENBORN:	14:27:21
8	Q Mr. Bett, I -- I'd be remiss if I didn't	14:27:28
9	ask.	14:27:33
R 10	Have you ever been convicted of a crime?	14:27:34
11	A No.	14:27:34
12	Q Have you ever been sued personally?	14:27:37
13	A I have.	14:27:39
14	Q Was one of those times when you were sued,	14:27:44
15	along with Johnny, in relation to an alleged	14:27:47
16	treatment of someone at a concert?	14:27:53
17	A Correct.	14:27:55
18	Q What about other than that? Have you ever	14:27:56
19	been sued personally?	14:27:59
20	A Twice with the Sheriff's Department.	14:28:00
21	Q Okay. What was the outcome of those two	14:28:05
22	suits?	14:28:08

R	1	A It was an out-of-court settlement.	14:28:08
	2	Q And what was the nature of the allegations	14:28:11
	3	in the first of those suits?	14:28:19
	4	A They were uses of force.	14:28:19
	5	Q What was the -- what was the allegation	14:28:21
	6	against you in the first one? Let's take them one	14:28:27
	7	by one.	14:28:33
	8	A It was just -- there was an injury to one	14:28:34
	9	suspect in the first one. And the second suspect	14:28:36
	10	was injured. His elbow was broken.	14:28:40
	11	Q What was the injury in the first one?	14:28:43
	12	A Just scuff marks on the face and so forth.	14:28:45
	13	Q Okay. Any brain injury?	14:28:48
	14	A No. It was -- he just -- he filed the	14:28:52
	15	lawsuit, and they paid him some small amount. I	14:28:58
	16	-- I want to say it was like the range between	14:29:02
	17	like, I don't know, 10 or \$20,000 before it even	14:29:04
	18	went to trial or anything like that.	14:29:08
	19	Q Okay. Did the second one go to trial?	14:29:09
	20	A No. The second one they settled before	14:29:12
	21	trial.	14:29:15
	22	Q Oh, that's right. You said that. Okay.	14:29:16

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1	But other than those three, anything else?	14:29:18
2	A No.	14:29:27
3	Q Would you say that Johnny has a problem	14:29:27
4	remembering things?	14:29:31
5	MS. VASQUEZ: Objection. Vague. Calls	14:29:31
6	for speculation.	14:29:33
7	A Personally with me, I can't say that he	14:29:35
8	has.	14:29:40
9	Q Have there been times that you've observed	14:29:42
10	when Johnny has woken up and he didn't know what	14:29:44
11	happened the night before?	14:29:49
12	MS. VASQUEZ: Vague.	14:29:50
13	A He never -- if that did happen, he never	14:29:55
14	specifically said anything directly to me. So I	14:29:59
15	just can't remember ever having a conversation	14:30:03
16	like that.	14:30:07
VA,R, FSPK	17 Q Have you -- would you describe Johnny's	14:30:07
	18 alcohol consumption as excessive?	14:30:12
	19 MS. VASQUEZ: Objection. Vague.	14:30:15
VA,R, FSPK	20 A Everybody has their own interpretation of	14:30:19
	21 what excessive is, so, you know --	14:30:21
	22 Q I'm asking for yours.	14:30:25

1	Would you consider Johnny's alcohol use	14:30:26
2	excessive?	14:30:30
3	A In my opinion?	14:30:31
4	Q Yes.	14:30:34
5	A No.	14:30:35
6	Q Would you consider Johnny's use of drugs	14:30:35
7	-- let's break it down.	14:30:41
8	Would you consider Johnny use of illegal	14:30:42
9	drugs as excessive?	14:30:47
O 10	MS. VASQUEZ: Objection. Asked and	14:30:49
11	answered. Misstates the testimony.	14:30:50
12	A Well, I don't know when or where he's done	14:30:54
13	illegal drugs. So I can't tell you if something	14:30:57
14	is excessive or not if I haven't witnessed it.	14:31:00
15	Q So the answer is that you would not	14:31:06
16	consider his use of illegal -- excessive?	14:31:08
17	MS. VASQUEZ: Objection. Misstates the	14:31:11
18	prior testimony -- I'm sorry, Ben. Were you not	14:31:13
19	done?	14:31:17
20	MR. ROTTENBORN: No, I was just saying I	14:31:19
21	think Ben can't help himself. I don't think both	14:31:21
22	of you should be objecting.	14:31:25

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1 MS. VASQUEZ: I don't think Mr. Chew was 14:31:28
2 objecting. He might have been moving in his chair 14:31:31
3 and made a noise, but I'm pretty sure he wasn't 14:31:31
4 objecting. 14:31:31

5 MR. ROTTENBORN: All right. My apologies, 14:31:31
6 Ben. Although you aren't on mute, so -- just so 14:31:34
7 you know. 14:31:34

8 BY MR. ROTTENBORN: 14:31:34

9 Q Would you -- would you consider -- so let 14:31:38
10 me try that again. 14:31:39

R, FSPK 11 Would you consider Mr. Depp's use of 14:31:40
12 illegal drugs excessive? 14:31:43

13 MS. VASQUEZ: Asked and answered. 14:31:46

R, FSPK 14 A I've answered that sir. 14:31:49

15 Q Answer it again for me. I didn't 14:31:52
16 understand what your answer was. 14:31:54

17 A I haven't seen him do, in my presence, 14:31:55
18 illegal drugs, so I can't answer what is excessive 14:31:59
19 and what isn't if I haven't seen it. 14:32:02

20 Q Do you believe he uses illegal drugs 14:32:05
21 excessively? 14:32:08

22 MS. VASQUEZ: Asked and answered. Calls 14:32:10

1 for speculation. 14:32:11

R, FSPK 2 A Again, I just answered that. 14:32:13

3 Q And I'm looking for -- you've spent 14:32:16
4 hundreds of hours around the man, if not 14:32:19
5 thousands; correct? 14:32:23

6 A I've spend a long time around him, 14:32:24
7 correct, over the years. 14:32:27

8 Q It is it fair to say thousands of hours? 14:32:28

9 A I don't know. I was never looking at my 14:32:31
10 watch. 14:32:34

11 Q And -- and I'm asking you, in your 14:32:34
12 opinion, do you consider Mr. Depp to be someone 14:32:39
13 who uses illegal drugs excessively? 14:32:42

14 MS. VASQUEZ: Asked and answered. Calls 14:32:46
15 for speculation. Vague. 14:32:47

R, FSPK 16 A Again, I can't have an opinion to 14:32:49
17 something that I didn't partake in or witness. 14:32:51

18 Q So you don't believe then -- if you 14:32:58
19 haven't witnessed it, then your testimony is that 14:33:00
20 you don't believe he uses illegal drugs 14:33:03
21 excessively, right? 14:33:06

22 MS. VASQUEZ: Objection. Misstates the 14:33:08

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1	testimony, argumentative, harassing,	14:33:10
2	unintelligible.	14:33:13
R, FSPK, 3 IO, VA	A Only he can answer that question.	14:33:16
4	Q Do you believe he has a drug problem?	14:33:18
5	MS. VASQUEZ: Objection. Calls for	14:33:21
6	speculation. Vague.	14:33:22
R, FSPK, 7 IO, VA	A Only he can answer that question.	14:33:24
8	Q I'm asking for your opinion.	14:33:27
9	Do you believe Mr. Depp has a drug	14:33:28
10	problem?	14:33:31
11	MS. VASQUEZ: Same objections.	14:33:31
R, FSPK, 12 IO, VA	Q He can't answer that question. You can	14:33:39
13	answer that question, Mr. Bett.	14:33:40
14	Do you believe Mr. Depp has a drug	14:33:42
15	problem?	14:33:45
16	MS. VASQUEZ: Objection. Vague as to	14:33:45
17	time. Assumes facts.	14:33:47
R, FSPK, 18 IO, VA	A Can you specify drugs?	14:33:50
19	Q I'm just going to answer the ask the	14:33:53
20	question like that. Do you believe Mr. Depp has a	14:33:55
21	drug problem?	14:33:57
22	MS. VASQUEZ: Same objections.	14:33:58

Transcript of Sean Bett
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R, FSPK,
IO, VA

1

A I can't answer that question because it's

14:34:01

2

too vague.

14:34:02

3

Q Do you believe Mr. Depp has a problem with

14:34:03

4

illegal drugs?

14:34:05

5

MS. VASQUEZ: Same objections.

14:34:07

R, FSPK, 6
IO, VA

7

A Again, only Mr. Depp can answer that

14:34:08

question.

14:34:11

8

Q So you're refusing to answer that

14:34:12

9

question. I don't know -- I understand what --

14:34:14

10

we've deposed Mr. Depp, and I understand what his

14:34:17

11

thoughts on the matter are. I'm asking you for

14:34:20

12

your thoughts.

14:34:22

13

Do you believe Mr. Depp has a problem with

14:34:22

14

illegal drugs?

14:34:24

15

MS. VASQUEZ: Same objections. Asked and

14:34:26

16

answered.

14:34:26

17

A Again, I can't answer a question to

14:34:29

18

something I'm not privy to.

14:34:32

R, FSPK, 19
IO, VA

20

Q Do you believe he has a problem abusing

14:34:35

prescription drugs?

14:34:38

21

MS. VASQUEZ: Same objections.

14:34:41

R, FSPK, 22
IO, VA

22

A I can't have an opinion on that because I

14:34:43

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Transcript of Sean Bett
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R, ICE	1	don't -- he's the one that takes them. He's	14:34:45
	2	prescribed them. So only he can answer that	14:34:48
	3	question, if he takes too many or too less. I'm	14:34:50
	4	not with him all the time when he's taking his	14:34:54
	5	prescription drugs.	14:34:56
	6	Q Mr. Depp has -- has a temper, doesn't he?	14:34:57
	7	You you've seen him get angry, right?	14:35:02
	8	MS. VASQUEZ: Objection. Compound, vague,	14:35:05
	9	assumes facts, argumentative.	14:35:08
R, ICE	10	A I've seen Mr. Depp be agitated.	14:35:10
	11	Q You've seen him destroy property, right?	14:35:13
	12	MS. VASQUEZ: Objection. Assumes facts.	14:35:16
R, ICE	13	A What do you mean by destroy property?	14:35:19
	14	Q You've seen him destroy property in his	14:35:22
	15	home, right?	14:35:24
	16	MS. VASQUEZ: Objection. Vague.	14:35:25
R, ICE	17	A I've seen him drop a plate. I've seen him	14:35:31
	18	drop a glass.	14:35:35
	19	Q You've seen him break -- intentionally	14:35:36
	20	break glass before, right?	14:35:42
	21	A I've seen him drop a plate. I've seen him	14:35:43
	22	drop a glass.	14:35:47

IU, ICE	1	Q And you've seen him throw glass, right?	14:35:48
	2	A I've seen him drop a plate. I've seen him	14:35:52
	3	drop a glass.	14:35:56
	4	Q And I understand that that's what you	14:35:57
	5	answered three questions ago, but that's not my	14:35:59
	6	question.	14:36:03
	7	You've seen him throw glass before, right?	14:36:03
	8	A I haven't seen him throw glass.	14:36:06
	9	Q Never? You've never seen him throw glass?	14:36:08
O	10	MS. VASQUEZ: Asked and answered.	14:36:11
	11	Q That's your testimony under oath?	14:36:14
O	12	MS. VASQUEZ: Asked and answered.	14:36:16
	13	Harassing. Argumentative.	14:36:17
	14	Q Go ahead and answer.	14:36:21
	15	A I haven't seen him --	14:36:22
	16	MS. VASQUEZ: For the second time.	14:36:22
	17	THE REPORTER: Can you say the answer	14:36:22
	18	again?	14:36:22
	19	A I haven't seen him throw glass.	14:36:32
	20	Q You've seen him -- you've known him to, as	14:36:38
	21	he calls it, smash up rooms?	14:36:41
	22	MS. VASQUEZ: Objection.	14:36:43

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1	Sorry, Mr. Bett. Objection. Vague.	14:36:45
2	Calls for speculation.	14:36:53
3	Go ahead and answer, if you can.	14:36:56
4	A Well, it needs to be repeated because the	14:36:59
5	volume kind of went in and out on my laptop.	14:37:02
R, ICE 6	Q You've seen -- have you seen Mr. Depp, as	14:37:06
7	he calls it, smash up rooms, right?	14:37:08
O 8	MS. VASQUEZ: Same objections.	14:37:10
9	A I haven't seen Mr. Depp smash up rooms.	14:37:13
R, ICE 10	Q You've seen him destroy property in anger,	14:37:17
11	while he was angry; correct?	14:37:20
12	MS. VASQUEZ: Objection. Compound. Asked	14:37:23
13	and answered. Assumes facts.	14:37:25
R, ICE 14	A I've seen him drop a plate and a glass.	14:37:28
15	Q That's -- is that -- can you think of any	14:37:33
16	other -- is that the extent of your testimony that	14:37:37
17	you're going to give about Mr. Depp's destruction	14:37:40
18	of property, is that you've seen him drop a plate	14:37:43
19	and seen him drop a glass?	14:37:52
20	A That's correct.	14:37:54
R, ICE 21	Q Have you seen him destroy any other	14:37:55
22	property?	14:37:57

1 MS. VASQUEZ: Objection. Vague. 14:37:59

R, FSPK 2 A I can't think of anything right now. 14:38:01

3 Q Now -- and Mr. Depp's temper, would you 14:38:06

4 agree, is exacerbated by his drug and alcohol -- 14:38:10

5 MS. VASQUEZ: Objection. Assumes facts. 14:38:16

6 Misstates the testimony. Vague. 14:38:19

R, FSPK 7 A Again, I've seen Mr. Depp get agitated. 14:38:23

8 So there's a difference between temper and 14:38:27

9 agitation. 14:38:30

10 Q Would you say his agitation that you've 14:38:31

11 observed is exacerbated by his drug and alcohol 14:38:35

12 abuse? 14:38:39

O 13 MS. VASQUEZ: Objection. Assumes facts. 14:38:40

14 Vague. 14:38:42

R, FSPK 15 A In my opinion, no. 14:38:44

16 Q Now, you didn't have much interaction with 14:38:46

17 Amber Heard when she was in a relationship with 14:38:49

18 Mr. Depp, right? 14:38:53

19 A I had some -- 14:38:55

20 Q Describe the nature of your interactions 14:39:00

21 with Ms. Heard? 14:39:03

O 22 MS. VASQUEZ: Objection. Vague. 14:39:06

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0	1	Compound.	14:39:07
	2	A I would do errands for Ms. Heard. I've	14:39:12
	3	driven her around multiple times. I've escorted	14:39:16
	4	her to movie events, red carpet events. I've been	14:39:23
	5	out to dinners with her, driven her to dinners.	14:39:27
	6	Q You've never -- you've never eaten dinner	14:39:32
	7	with her, right?	14:39:35
	8	A With a group of people, not specifically	14:39:36
	9	one-on-one. We've -- I've been at a table next to	14:39:40
	10	her and Johnny, and if they had guests or friends	14:39:44
	11	and so forth.	14:39:48
	12	Q Have you ever been at a table with them?	14:39:48
	13	A Yes. I think a group of us have been	14:39:55
	14	where I was --	14:39:59
	15	Q When?	14:39:59
	16	A I'm sorry?	14:40:01
	17	Q When? When?	14:40:01
	18	A It could be the one time we were in Austin	14:40:02
	19	Texas, where she was getting an award. But we	14:40:07
	20	were at a restaurant downtown, and I believe all	14:40:11
	21	of us were at a huge table with her and her	14:40:14
	22	parents, I believe.	14:40:17

1	Q But it wasn't -- it wasn't a common	14:40:18
2	occurrence for you to eat meals with Amber, right?	14:40:21
3	A No.	14:40:27
4	Q And when you would accompany her places,	14:40:27
5	that was at Johnny's direction; correct?	14:40:30
6	A Correct.	14:40:33
7	Q And there were times when she went out and	14:40:34
8	he told you to accompany her or to follow her,	14:40:37
9	right?	14:40:41
O 10	MS. VASQUEZ: Objection. Compound. Vague	14:40:42
11	as to follow.	14:40:46
12	A He'd asked me to accompany her, never to	14:40:48
13	follow her.	14:40:51
14	Q You didn't work for Amber, right?	14:40:53
O 15	MS. VASQUEZ: Objection. Asked and	14:40:59
16	answered.	14:40:59
17	A I worked for Mr. Depp and the family.	14:41:02
18	Q And Amber didn't pay you or pay your	14:41:04
19	salary, right?	14:41:08
20	A Correct.	14:41:12
21	Q Did you ever see Amber and Johnny in a --	14:41:12
22	did you ever see Amber and Johnny argue?	14:41:22

1	A Oh, yes.	14:41:26
2	Q When?	14:41:27
3	A Multiple times.	14:41:28
4	Q And would they both yell things at each	14:41:29
5	other in your presence?	14:41:36
6	A Yeah. Mostly from her, though.	14:41:37
7	Q Did you ever see Johnny yell things at	14:41:40
8	her?	14:41:43
9	A Yes.	14:41:44
10	Q What sort of things?	14:41:50
11	A I mean, they were just in heated	14:41:53
12	arguments. She would be swearing at him. He	14:41:56
13	would swear back. I'd say, it's time to leave, if	14:41:59
14	we were downtown at the apartment buildings.	14:42:03
15	Because as things got progressively worse with the	14:42:06
16	arguing, there was -- mostly primarily started by	14:42:09
17	her. It was almost a daily bi-daily occurrence.	14:42:13
18	Q Name -- name an argument started by her.	14:42:18
19	A Well, this is what he's telling me. She	14:42:21
20	-- she started arguments about money. Is she	14:42:26
21	going to be taken care of? Does he have life	14:42:30
22	insurance on him for her if he dies? And so	14:42:36

1	forth.	14:42:38
2	Q And so that information that she started	14:42:38
3	the arguments came to you from Johnny?	14:42:41
4	A Correct.	14:42:43
5	Q So, sitting here today, you can't name a	14:42:44
6	single argument between them that you saw that you	14:42:46
7	can say, definitively, she started; is that fair?	14:42:49
8	A Well, I can think of one specifically in	14:42:58
9	regard to a road trip we did where she was driving	14:43:01
10	the brand-new Range Rover that Johnny purchased	14:43:06
11	for her and Nathan homes and I were following	14:43:09
12	behind in the SUV. And we weren't even on the	14:43:14
13	freeway for more than five minutes, and Johnny	14:43:18
14	sent Nathan a text saying, she's at it again, we	14:43:21
15	might have to turn around and go back home. And	14:43:25
16	apparently, we just -- they calmed the, you know	14:43:28
17	-- they squashed it in the car, and we continued	14:43:31
18	driving to Arizona, I believe.	14:43:34
19	Q But that wasn't something -- that wasn't	14:43:35
20	an argument that you personally witnessed?	14:43:37
21	A No. It was just from text messages that	14:43:41
22	Nathan was reading to me in the car while we were	14:43:44

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1 driving behind them. 14:43:47

2 Q Right. Did you ever see Mr. Depp be 14:43:48

3 violent toward Amber? 14:43:52

4 A No. 14:43:53

FSPK 5 Q And, of course, you have no personal 14:43:54

6 knowledge of whether or not he was violent to her 14:44:02

7 at times when you were not around them, right? 14:44:04

8 MS. VASQUEZ: Objection. Assumes facts 14:44:08

9 not in evidence. Calls for speculation. Lack of 14:44:10

10 foundation. 14:44:12

FSPK 11 A If I'm not present, I have no knowledge of 14:44:15

12 what goes on when they were together. 14:44:18

13 Q Ms. Heard may have suffered injuries at 14:44:21

14 the hands of Mr. Depp over the years that you 14:44:24

15 didn't observe or you didn't see; correct? 14:44:27

16 MS. VASQUEZ: Objection. Assumes facts, 14:44:30

17 lack of foundation. Speculation. 14:44:33

FSPK 18 A Correct. 14:44:33

VA, SP, H¹⁹ Q Ms. Heard didn't confide in you, right? 14:44:41

20 MS. VASQUEZ: Objection. Vague. Calls 14:44:44

21 for speculation. 14:44:45

VA, SP, H²² A She did a few times when I had to drive 14:44:49

VA, 1 her home from Los Angeles back to the apartments 14:44:51
SP, H 2 when she would -- when they would be arguing. And 14:44:54
3 she would sit there, or she'd cry in the car 14:45:00
4 saying she just loves him so much, and I would 14:45:03
5 tell her the argument -- arguments should stop 14:45:07
6 because it's not going to be good for their 14:45:10
7 marriage and someone's going to end up going to 14:45:13
8 jail because this can't continue on an everyday 14:45:16
9 basis. And that happened on a few occasions. 14:45:20

10 Q Okay. Let's break that down a little bit. 14:45:23

11 What, specifically, did she say to you, 14:45:25
12 and when -- well, I don't want to ask a compound 14:45:27
13 question. 14:45:30

14 When was -- when were these conversations 14:45:31
15 in which you say she confided in you? 14:45:37

16 A It would have been somewhere between 2014 14:45:39
17 and '16. 14:45:42

18 Q Do you remember where you were driving 14:45:44
19 her? 14:45:46

20 A Yeah. I was driving her back to the 14:45:46
21 downtown apartments at the request of J.D. because 14:45:49
22 on both occasions she was out and about in the 14:45:52

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1	West Hollywood area, and she stopped by his	14:45:56
2	Hollywood house.	14:46:01
3	They would be -- get in an argument over	14:46:03
4	whatever, and I could hear her screaming in his	14:46:06
5	house. He would come out and say she's upset,	14:46:10
6	just make sure she drives home. And she'd be	14:46:14
7	crying. She was, you know, crying all the way	14:46:19
8	home, saying, I just love him, and all this.	14:46:21
9	Q Do you remember any specific dates?	14:46:24
10	A Not specific dates, no.	14:46:26
ICD, 11	Q Specific time frames, other than 2014 to	14:46:28
H, FSPK 12	2016?	14:46:35
13	A No. I couldn't tell you the months or	14:46:35
14	dates. I just -- it was sometime within there	14:46:38
15	where I had driven her home a few times.	14:46:41
16	Q And why -- you say that you told her you	14:46:43
17	need to -- both need to stop or else someone's	14:46:47
18	going to go to jail?	14:46:50
19	A Yeah.	14:46:52
20	Q Why did you say that?	14:46:53
21	A Well, it's not healthy for a relationship	14:46:54
22	when you're constantly screaming and hollering.	14:46:57

1	And judging -- or correction, from my experience	14:47:00
2	in law enforcement, if there's arguing going on	14:47:03
3	every day that's when, you know, things can get	14:47:07
4	physical.	14:47:10
5	Q Because those arguments can lead to	14:47:10
6	physical violence, correct?	14:47:13
7	A Correct.	14:47:15
8	MS. VASQUEZ: Objection. Calls for	14:47:15
9	speculation.	14:47:16
10	Q And I believe it was your testimony that	14:47:24
11	you -- well, let me ask you this.	14:47:26
12	Would you testify that you ever saw her be	14:47:28
13	violent with him?	14:47:34
14	A I've seen her become aggressive by	14:47:34
15	screaming and hollering and going up where she's	14:47:37
16	just inches away from his face.	14:47:40
17	Q Have you ever seen her be physically	14:47:42
18	violent with him?	14:47:45
19	A Physically striking him, no.	14:47:46
20	Q Have you seen him yell in her face?	14:47:48
21	A Not within inches of close proximity, no.	14:47:53
22	Q So is it fair to say that while you've	14:48:13

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1	seen Ms. Heard yell and get emotional toward	14:48:16
2	Johnny, you've never seen her do something that	14:48:22
3	you would call physically violent or assault of	14:48:26
4	Johnny?	14:48:29
5	A Correct.	14:48:31
6	MS. VASQUEZ: Assumes -- sorry. I'm going	14:48:33
7	to interpose an objection. Calls for speculation.	14:48:34
8	Assumes facts, misstates testimony, and compound.	14:48:37
9	Q Now, you testified in the United Kingdom	14:48:45
10	before about their relationship, right?	14:48:52
11	A I did.	14:48:53
12	Q And I know the UK works a little bit	14:48:54
13	differently than the US. You signed a witness	14:48:59
14	statement that was under oath; correct?	14:49:04
15	A Correct.	14:49:07
16	Q And then you gave live testimony at the	14:49:07
17	trial as well, right?	14:49:10
18	A I did.	14:49:12
19	Q And you've also signed a -- you signed a	14:49:13
20	declaration in support -- or a declaration on	14:49:18
21	behalf of Johnny Depp during the divorce	14:49:21
22	proceedings that he had with Amber, right?	14:49:25

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ICD, 1	A Correct.	14:49:28
IU 2	Q And that was under oath as well?	14:49:28
3	A Correct.	14:49:31
4	MR. ROTTENBORN: I'd like to pull up the	14:49:37
5	exhibit called Sean Bett's Witness Statement with	14:49:40
6	Exhibit, please.	14:49:45
7	THE TECHNICIAN: Please stand by.	14:49:48
8	MR. ROTTENBORN: Thanks.	14:49:50
9	THE TECHNICIAN: Exhibit 4.	14:50:08
10	(BETT Exhibit 4 was marked for	14:49:53
11	identification and is attached to the transcript.)	14:49:53
12	BY MR. ROTTENBORN:	14:49:53
13	Q Mr. Bett, it's up to you whether or not	14:50:17
14	you want control of this document or you want --	14:50:20
15	you want them to have it.	14:50:23
16	But I guess my question, my first question	14:50:24
17	to you, is, is this the witness statement that you	14:50:27
18	signed on behalf of Mr. Depp in the UK proceeding?	14:50:31
19	MS. VASQUEZ: Mr. Bett, I'm just going to	14:50:41
20	advise you to review this document before	14:50:44
21	answering any questions on it.	14:50:47
22	THE WITNESS: Okay. Let me control it so	14:50:49

1	I can scroll down.	14:50:51
2	A Okay. This -- this document is familiar.	14:51:16
3	I do remember reading it.	14:51:18
4	Q Is that your signature on page 5?	14:51:22
5	A It is.	14:51:24
6	Q Now, you didn't write this document, did	14:51:24
7	you?	14:51:38
8	MS. VASQUEZ: Objection. Assumes facts	14:51:38
9	not in evidence. Vague.	14:51:41
10	A I dictated it.	14:51:42
11	Q To -- you dictated it to Adam Waldman,	14:51:46
12	right?	14:51:51
13	MS. VASQUEZ: Objection. Assumes facts.	14:51:56
14	A Correct.	14:51:56
15	Q Adam Waldman is Mr. Depp's attorney;	14:52:00
16	correct?	14:52:05
17	A Correct.	14:52:05
18	Q And you -- is it your testimony that you	14:52:05
19	just dictated this and that the document is	14:52:09
20	verbatim words that came out of your mouth?	14:52:13
21	MS. VASQUEZ: Objection. Compound.	14:52:17
22	Vague.	14:52:19

1	Mr. Bett, I would suggest you read the	14:52:21
2	document before answering that question.	14:52:26
3	MR. ROTTENBORN: That's -- that's totally	14:52:28
4	inappropriate coaching, Camille, but, Mr. Bett,	14:52:30
5	you can answer.	14:52:34
6	MS. VASQUEZ: You can answer once you've	14:52:36
7	read the document, Mr. Bett.	14:52:38
8	MR. ROTTENBORN: No, you don't get to	14:52:40
9	instruct the witness that he has to read the	14:52:42
10	document. You can answer if you understand the	14:52:44
11	question.	14:52:44
12	That's totally inappropriate, Camille.	14:52:45
13	You know it.	14:52:48
14	MS. VASQUEZ: It's inappropriate for you	14:52:49
15	to ask the witness whether it's verbatim what he	14:52:50
16	said or dictated without allowing him time to read	14:52:54
17	verbatim every word in the document that's seven	14:52:57
18	pages long. That's inappropriate.	14:53:01
19	A I'm just scrolling down a little bit.	14:53:04
20	This is what I did dictate to Mr. Waldman.	14:53:20
21	BY MR. ROTTENBORN:	14:53:26
22	Q Verbatim?	14:53:27

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1	A	Yes.	14:53:30
2	Q	So all these words in here are yours --	14:53:30
3	MS. VASQUEZ:	Objection. Asked and	14:53:34
4		answered.	14:53:34
5	A	This is what I dictated to Mr. Waldman.	14:53:39
6		Excuse me.	14:53:43
7	Q	And my question is so all the words in	14:53:44
8		this document are yours that came out of your	14:53:47
9		mouth?	14:53:51
10	MS. VASQUEZ:	Same objections.	14:53:52
11	A	They appear to be, correct.	14:53:55
IR 12	Q	Now, if you go to paragraph 5, please, you	14:54:00
13		say at the end of it, indeed, when they were in	14:54:06
14		Los Angeles, I would have been with Mr. Depp and	14:54:10
15		Ms. Heard between five and seven days a week. So	14:54:12
16		had Ms. Heard sustained any injuries at that time,	14:54:16
17		I would have seen them. I saw no such injuries.	14:54:19
18		Do you see that?	14:54:23
19	A	Is this paragraph No. 5?	14:54:24
20	Q	Yeah, I'm sorry. Paragraph 5. The last	14:54:27
21		-- second to last sentence.	14:54:40
22	A	Okay. Let me -- correct.	14:54:45

IR	1	Q So your testimony under oath in this	14:54:47
	2	statement is that if Ms. Heard had suffered any	14:54:50
	3	injuries, you would have seen them.	14:54:54
	4	Is that what you're saying?	14:54:56
	5	MS. VASQUEZ: Objection. The document	14:54:58
	6	speaks for itself. Argumentative.	14:54:59
	7	A If Ms. Heard had any injuries, I would	14:55:02
	8	have seen them, correct.	14:55:04
	9	Q So it's not possible that you -- it's not	14:55:06
	10	possible for Ms. Heard to have suffered any	14:55:09
	11	injuries that you wouldn't have seen.	14:55:13
	12	Is that your testimony?	14:55:16
	13	MS. VASQUEZ: Objection. Misstates prior	14:55:16
	14	testimony. Argumentative.	14:55:18
	15	A If there were injuries in areas that I	14:55:27
	16	couldn't see that were hidden by clothing. I	14:55:31
	17	wouldn't be able to see them, correct.	14:55:34
	18	Q Well, you didn't see that in your sworn	14:55:36
	19	witness statement, did you? You just said if Ms.	14:55:39
	20	Heard had suffered any -- sustained any injuries	14:55:42
	21	during that time, I would have seen them.	14:55:44
	22	So my question for you, Mr. Bett, is, is	14:55:47

1 it your testimony that if Ms. Heard -- that if you
2 didn't see any injuries on Ms. Heard, that means
3 she didn't suffer them.

14:55:51

14:55:56

14:56:00

4 Is that -- is that what you're saying?

14:56:02

5 MS. VASQUEZ: Objection. Argumentative.

14:56:03

6 Harassing. Misstates prior testimony. Improper
7 impeachment.

14:56:05

14:56:13

8 A My statement is I should have articulated
9 a little bit more.

14:56:15

14:56:19

10 Q And -- and so the record's clear, I'm not

14:56:20

11 -- this isn't impeachment, so the -- is it

14:56:27

12 possible that Ms. Heard could have suffered

14:56:37

13 injuries on parts that were visible to you but

14:56:40

14 obscured them with makeup?

14:56:44

O 15 MS. VASQUEZ: Calls for speculation.

14:56:46

16 A If there were any injuries to her face,

14:56:49

17 arms that weren't covered, I would have been able

14:56:51

18 to see them.

14:56:56

19 Q Even if she had put makeup over them?

14:56:58

O 20 MS. VASQUEZ: Asked and -- asked and

14:57:01

21 answered. Calls for speculation.

14:57:05

22 A I would have been able to see them.

14:57:06

1	Q Ms. Heard wore makeup every day, didn't	14:57:14
2	she?	14:57:18
O 3	MS. VASQUEZ: Objection. Calls for	14:57:19
4	speculation. Assumes facts.	14:57:20
5	A No, she didn't.	14:57:22
6	Q And there were times when Ms. HER Heard	14:57:24
7	are as in LA where you might go days at a time	14:57:26
8	without coming into close contact with her, right?	14:57:31
O 9	MS. VASQUEZ: Assumes facts. Vague.	14:57:36
10	A If I was working that day, there -- I	14:57:39
11	can't even think of more than a handful of times	14:57:47
12	when I wouldn't have seen her unless, you know,	14:57:51
13	she was out working or out with friends. But for	14:57:53
14	the most part, if I was there working five, six,	14:57:57
15	seven days a week, I would have seen her at least	14:58:01
16	one time throughout the day, minimal.	14:58:04
17	Q But you may not have been close to her,	14:58:06
18	right? You may have seen her walk across the room	14:58:09
19	or walk across the yard, that sort of thing, but	14:58:13
20	you're not close to her, right?	14:58:14
21	MS. VASQUEZ: Objection. Vague.	14:58:15
22	Compound.	14:58:15

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1 Q It was your testimony that every day that 14:58:21
2 she was in LA you had close enough contact with 14:58:23
3 her that you absolutely would have seen any 14:58:26
4 injuries that she sustained? 14:58:31

O 5 MS. VASQUEZ: Objection. Misstates the 14:58:31
6 prior testimony, argumentative, compound, vague. 14:58:33

7 A Well, in the -- in the residence, downtown 14:58:36
8 Los Angeles, there is no yard. There's an outdoor 14:58:40
9 patio. And seeing her every single day, unless 14:58:45
10 she was out all day and I didn't see her, maybe 14:58:48
11 once out of a great moon, I would have seen her up 14:58:51
12 close. She wouldn't just walk by on a daily 14:58:58
13 basis. She would have me or whoever was working 14:58:58
14 run, errands or she'd have questions and so forth. 14:59:00
15 So we were always within close proximity 14:59:05
16 because the apartment on the inside wasn't that 14:59:08
17 big. 14:59:10

18 Q And you didn't -- 14:59:12

19 A We would talk -- 14:59:11

VA 20 Q When she was in the apartment, you weren't 14:59:15
21 -- you weren't hanging out in the apartment most 14:59:17
22 of the time, right? 14:59:20

1 MS. VASQUEZ: Objection. Vague. 14:59:23

VA 2 A I would only go into the apartment if I -- 14:59:24

3 if I was summoned by Ms. Heard or Mr. Depp. 14:59:27

IR 4 Q If you go to paragraph 6, you say, I was 14:59:31

5 also told by Mr. Depp on multiple occasions that 14:59:46

6 Ms. Heard had physically abused him. 14:59:50

7 Do you see that? 14:59:53

8 A I do. 14:59:54

9 Q What occasions are those? I want to know 14:59:55

10 everything about every -- that you have to say 15:00:00

11 about each of those occasions. So it's very 15:00:02

12 important that we be as detailed as we can. 15:00:07

13 Describe those occasions for me, please. 15:00:10

14 A There were weekly, biweekly occasions, 15:00:11

15 sometimes bi-daily occasions, where they would get 15:00:15

16 in an argument, she would be upset with him 15:00:20

17 because he showed up late or he didn't get back 15:00:22

18 with her in time over a question. And she'd pop 15:00:27

19 him -- or correction, she'd slap him on the side 15:00:30

20 of the face and so forth. Or she'd push him. 15:00:33

21 This would happen quite frequently. As 15:00:37

22 far as the details, I wasn't interrogating him, 15:00:39

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IR

1 saying I need to know so I can file with the DA. 15:00:44
2 This is what happened quite frequently. 15:00:47
3 Q You never -- 15:00:49
4 A And it happened around other security 15:00:50
5 personnel. 15:00:52

6 Q You never actually saw that happen, 15:00:53
7 though, right? You already testified that you 15:00:56
8 never saw her physically assault him? 15:00:58
9 A Correct. 15:00:58

IR,H

10 Q So this is just what Mr. Depp -- what's 15:00:59
11 the source of this information that this happened 15:01:01
12 weekly, biweekly, or sometimes bi-daily? 15:01:05
13 A Well, it's coming from Mr. Depp who would 15:01:09
14 tell me if I was there. And then we would get in 15:01:12
15 the car and go back to his Hollywood address so we 15:01:16
16 could get him out of that situation and let them 15:01:19
17 both cool down. 15:01:22

18 Q But sitting here today, you can't -- you 15:01:24
19 can't name for me a single instance where you 15:01:30
20 witnessed this alleged physical abuse by Ms. Heard 15:01:32
21 toward Mr. Depp? 15:01:38

22 MS. VASQUEZ: Objection. Asked and 15:01:42

1	answered, misstates the prior testimony, and	15:01:43
2	compound.	15:01:45
3	A No, I can't tell you that I physically saw	15:01:46
4	her strike him. I can only tell you what he told	15:01:51
5	me happened that specific moment, and we got him	15:01:55
6	out of the situation.	15:01:58
7	Q So I guess one -- one question I have for	15:01:59
8	you is, when you were -- when you were doing this,	15:02:02
9	writing this statement under oath, Mr. Bett, when	15:02:05
10	you say Ms. Heard was verbally and physically	15:02:09
11	abusive toward Mr. Depp, why would you write a	15:02:15
12	statement like that when you don't actually have	15:02:18
13	personal knowledge that she was physically abusive	15:02:22
14	toward Mr. Depp?	15:02:24
15	MS. VASQUEZ: Objection. Improper use of	15:02:25
16	this document. Argumentative. Misstates his	15:02:28
17	prior testimony.	15:02:35
18	A Again, I should have articulated a little	15:02:36
19	bit more and added a statement that in regards to	15:02:39
20	the physical abuse, this was secondhand	15:02:42
21	information coming from Mr. Depp.	15:02:45
22	Q Can you go to paragraph 8, please?	15:02:47

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1	A	Sure.	15:02:51
2		Okay.	15:03:16
3	Q	What do you remember about this night?	15:03:16
4	A	He had a couple meetings in the Hollywood	15:03:21
5		area. It was her birthday party. We got there	15:03:24
6		later on in the evening, a little bit past the	15:03:28
7		original start time that she was going to have	15:03:31
8		dinner with friends and so forth. And she was	15:03:36
9		quite upset, and then they got into an argument.	15:03:38
10		And she struck him, and he had a little bit of an	15:03:42
11		injury, and we got him out of there.	15:03:45
12	Q	You didn't see her strike him, right?	15:03:52
13	A	Correct.	15:03:55
14	Q	You have no idea -- you didn't see them	15:03:55
15		argue, right?	15:04:09
16	MS. VASQUEZ:	Objection. Misstates prior	15:04:10
17		testimony.	15:04:12
18	A	No, I didn't see them argue.	15:04:12
19	Q	So when you said a little bit of an	15:04:19
20		argument and she struck him, that's nothing that	15:04:24
21		you have personal knowledge of; correct?	15:04:27
22	MS. VASQUEZ:	Asked and answered.	15:04:29

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1	A I didn't see them argue, and I didn't see	15:04:30
2	her strike him. This is only what Mr. Depp told	15:04:33
3	me.	15:04:36
4	Q Was -- was he in a meeting with Ed White	15:04:37
5	that evening?	15:04:41
6	MS. VASQUEZ: Calls for speculation.	15:04:42
7	A I can't remember who was at that meeting.	15:04:48
8	It's possible, but it was so long ago. I can't --	15:04:49
9	it's possible Mr. White was there.	15:04:54
10	Q Was he -- Mr. Depp when you took him to --	15:04:57
11	was Ms. Heard's birthday party -- it was at the	15:05:01
12	Eastern Columbia building; correct?	15:05:07
13	A Correct.	15:05:10
14	Q Was Mr. Depp drinking when you took him	15:05:10
15	over there after the meeting?	15:05:14
16	MS. VASQUEZ: Objection. Vague.	15:05:16
17	A He could have been. I can't remember.	15:05:19
18	It's possible they could have had a glass of wine	15:05:22
19	at his production office.	15:05:25
20	Q It's possible that they could have had	15:05:29
21	more than that at his production office too,	15:05:32
22	right?	15:05:34

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ICD,
IU, VA

1	MS. VASQUEZ: Calls for speculation.	15:05:35
2	A It's possible.	15:05:38
3	Q Now, I'm sure you remember testifying	15:05:40
4	about this in the UK, but you say that -- in	15:05:44
5	paragraph 8, you say, he had told me that	15:05:48
6	Ms. Heard had sought to argue with him and had	15:05:52
7	punched him causing him to sustain visible injury.	15:05:56
8	I took a picture of his injury, and it is at page	15:05:59
9	1 of Exhibit SV1.	15:06:02
10	A Uh-huh.	15:06:05
11	Q Do you see that?	15:06:06
12	A I do.	15:06:08
13	Q If you scroll down to the bottom of this	15:06:09
14	document, there's a picture there. And that's the	15:06:11
15	picture that you're referring to in this witness	15:06:13
16	statement, right?	15:06:16
17	A Correct.	15:06:17
18	Q And you later learn that this -- this	15:06:17
19	actually isn't a picture that you took; correct?	15:06:24
20	MS. VASQUEZ: Objection. Vague.	15:06:27
21	And, you know, to the extent that whatever	15:06:30
22	you learned about this photograph was relayed to	15:06:34

1 you by counsel, I'm going to instruct you not to 15:06:38
2 answer. If you have an independent knowledge 15:06:40
3 about this picture, then you can answer. 15:06:46

4 MR. ROTTENBORN: And I'll -- obviously, 15:06:54
5 you take your -- take your counsel's advice, 15:06:55
6 Mr. Bett, but I'll just say he's already testified 15:07:00
7 about this in the UK, so -- but why don't I -- why 15:07:03
8 don't I ask it differently. 15:07:07

9 BY MR. ROTTENBORN: 15:07:07

FSPK 10 Q This picture that's attached as Exhibit 1 15:07:09
11 to your sworn witness statement is not a picture 15:07:11
12 of Mr. Depp on or about April 21st, 2016, is it? 15:07:14

13 MS. VASQUEZ: Calls for speculation. 15:07:19

FSPK 14 A It looks very similar to several that I 15:07:25
15 took like that. 15:07:30

16 Q Where are those pictures -- alleged 15:07:41
17 pictures? 15:07:49

18 A There were some pictures on one of my 15:07:50
19 phones at the time, and there would have been 15:07:53
20 pictures on his phone that I would have taken. 15:07:55

21 Q Do you specifically recall taking pictures 15:08:00
22 with his phone? 15:08:02

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1	A	I have taken pictures of injuries with his	15:08:03
2		phone.	15:08:08
3	Q	And where are those pictures that	15:08:08
4		allegedly exist from April 21st, 2016?	15:08:12
O	5	MS. VASQUEZ: Calls for speculation.	15:08:16
	6	Compound.	15:08:24
7	A	They would have to be on his phone, I	15:08:25
8		presume.	15:08:25
9	Q	Where -- you said you took some on your	15:08:29
10		phone. Do you still have that phone? Do you	15:08:32
11		still have the pictures?	15:08:35
12	MS. VASQUEZ:	Compound.	15:08:37
13	A	I have pictures that I've taken on my	15:08:38
14		phone that were submitted as evidence.	15:08:41
15	Q	Where did you -- who did you submit them	15:08:44
16		to? Mr. Depp's lawyers?	15:08:47
17		Who?	15:08:51
18	A	Mr. Waldman.	15:08:51
MIL, NC, R	19	Q You gave them to Mr. Waldman?	15:08:53
	20	A Correct.	15:08:56
MIL, H, AF	21	Q And Mr. Waldman actually sent you this	15:08:56
	22	picture and told you that this was the one	15:09:00

1 allegedly from April 21st, 2016, right? 15:09:03

2 MS. VASQUEZ: Objection. Assumes facts. 15:09:07

MIL, 3 A Mr. Waldman showed me that picture. And I 15:09:15
H, AF

4 remember taking it, and I go, yes, that -- that 15:09:20

5 looks exactly like the one that I took. But, 15:09:23

6 again, he sent me this picture years later, so 15:09:26

7 it's possible the dates could have been off. 15:09:30

FSPK 8 Q And, in fact, this picture here was -- was 15:09:33

9 taken -- taken at a different date from April 21st 15:09:41

10 2016. You'd agree with that, right? 15:09:48

11 MS. VASQUEZ: Objection. Calls for 15:09:53

12 speculation. 15:09:54

13 A I believe it was -- if my recollection is 15:09:55

14 correct, it was taken from a different time. 15:10:00

15 MR. ROTTENBORN: Yeah, let's go ahead and 15:10:06

16 pull up, please, Exhibit J1.4D. 15:10:08

17 THE TECHNICIAN: Please stand by. 15:10:29

18 THE WITNESS: Excuse me. 15:10:29

19 THE TECHNICIAN: Exhibit 5. 15:10:33

20 (BETT Exhibit 5 was marked for 15:10:33

21 identification and is attached to the transcript.) 15:10:37

22 BY MR. ROTTENBORN: 15:10:37

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FSPK	1	Q This -- this picture is virtually	15:10:37
	2	identical, other than the fact that it's a	15:10:40
	3	screenshot, to the one that you attached to your	15:10:42
	4	witness statement; correct?	15:10:44
	5	A Correct.	15:10:47
	6	Q And this was taken -- this was a	15:10:47
	7	screenshot of your -- your phone, right?	15:10:52
	8	MS. VASQUEZ: Calls for speculation.	15:10:57
	9	Maybe he can -- someone can scroll down to see	15:10:59
	10	what the Bates number is so we can see the full	15:11:03
	11	picture.	15:11:11
	12	THE WITNESS: Scroll up.	15:11:13
	13	MS. VASQUEZ: What's the Bates number on	15:11:16
	14	this photograph?	15:11:18
	15	MR. ROTTENBORN: It's from the UK trial,	15:11:22
	16	so no Bates number.	15:11:25
	17	MS. VASQUEZ: Got it.	15:11:27
	18	THE WITNESS: Can you scroll up to the	15:11:28
	19	stop where the -- I just need to expand the top --	15:11:30
	20	right there, right there.	15:11:34
	21	MR. ROTTENBORN: Sure.	15:11:36
FSPK	22	A I -- I don't think that was from my phone.	15:11:38

1 BY MR. ROTTENBORN: 15:11:42

2 Q Okay. But in any event you see where it 15:11:42

3 says March 23rd, 2015, right? 15:11:47

4 A I do. 15:11:53

AF, 5 Q So the picture that you attached to your 15:11:54
FSPK

6 witness statement as coming from April 21st, 2016, 15:11:55

7 was actually taken on March 23rd, 2015; correct? 15:11:59

8 MS. VASQUEZ: Assumes facts. Calls for 15:12:04

9 speculation. 15:12:06

10 A : According to this time stamp that's on 15:12:07

11 top, it looks like it was taken a year prior. 15:12:10

12 Q And I may have asked this before, but are 15:12:21

13 you aware of any pictures in your possession that 15:12:24

14 show Johnny from April 21st, 2016, when he claims 15:12:28

15 he allegedly suffered injury? 15:12:36

16 A I looked on my phone, and I tried going to 15:12:39

17 cloud on all the pictures and I couldn't find it. 15:12:46

18 I tried searching emails or anything, and I 15:12:49

19 couldn't come up with it. 15:12:55

20 Q Does your cloud account have pictures, 15:12:56

21 whether they're of Mr. Depp or anything else, 15:12:59

22 predating April 21st, 2016, on your cloud account? 15:13:02

1	A It does.	15:13:06
2	Q Are there any other pictures that, to your	15:13:07
3	knowledge or to your belief, based on what	15:13:30
4	Mr. Depp told you, show injury caused by Ms.	15:13:33
5	Heard, other than the two that we've just looked	15:13:38
6	at?	15:13:41
7	A Well, there were the few that were taken	15:13:41
8	by me that I believe was around mid December of	15:13:44
9	2015, that were taken from my phone that I did	15:13:47
10	submit to Mr. Waldman.	15:13:50
11	Q Okay.	15:13:51
12	MR. ROTTENBORN: Can we pull up the	15:13:57
13	exhibit labeled JD Photos from Trial 1, please.	15:14:00
14	THE TECHNICIAN: Please stand by.	15:14:06
15	Exhibit 6.	15:14:21
16	(BETT Exhibit 6 was marked for	15:14:21
17	identification and is attached to the transcript.)	15:14:21
18	Q Are these the photos you were just	15:14:24
19	referring to, Mr. Bett?	15:14:26
20	A Correct.	15:14:30
21	Q And I have a few questions about these,	15:14:30
22	but before -- are there, other than these photos	15:14:33

1 and the two that we've just looked at, are there 15:14:37
2 any other photos that you believe may have come 15:14:41
3 from your possession allegedly showing injuries to 15:14:43
4 Mr. Depp caused by Ms. Heard? 15:14:47

O 5 MS. VASQUEZ: Vague. Assumes facts. 15:14:49

6 A I do remember taking other photos that had 15:14:59
7 scratch marks on them similar to this, but not 15:15:02
8 that specific date. But I -- I looked on my phone 15:15:07
9 and in the cloud, and I didn't see anything. And 15:15:11
10 I went from, you know, 2013 all the way up until 15:15:14
11 the present. 15:15:18

12 Q And before you looked on your phone in the 15:15:19
13 cloud, you would have sent those pictures you 15:15:22
14 saved to Mr. Waldman? 15:15:26

15 A Correct. 15:15:29

16 Q At some earlier date? 15:15:29

17 A Correct. 15:15:31

18 Q So if they exist, Mr. Waldman should have 15:15:31
19 them, right? 15:15:34

O 20 MS. VASQUEZ: Objection. Calls for 15:15:37
21 speculation. 15:15:39

22 A Correct -- 15:15:39

1	Q I'm sorry -- thank you.	15:15:45
2	Where are -- is the -- on this picture, on	15:15:53
3	the top picture here on the page that's labeled	15:16:00
4	F894.092, which I think is a notation from the UK,	15:16:07
5	describe for me the alleged injuries that you see.	15:16:14
6	A Well, there are scratch marks on the tip	15:16:17
7	of his nose. There appears to be a scratch mark	15:16:25
8	coming out at a 45-degree angle from the right	15:16:28
9	side of his forehead down towards his-- or	15:16:32
10	correction, the left side of his forehead down	15:16:35
11	towards the right side of his eyebrow.	15:16:39
H 12	Q And your understanding is that those	15:16:42
13	injuries were caused by Ms. Herd?	15:16:44
14	A Well, that's what Mr. Depp told me. They	15:16:48
15	literally just happened, and that's why I took the	15:16:54
16	photos immediately.	15:16:56
17	Q And so you took these photos immediately	15:16:57
18	after Mr. Depp told you that Ms. Heard had done	15:17:01
19	this to him?	15:17:06
20	A Correct.	15:17:07
21	Q And that those two injuries that you just	15:17:07
22	mentioned were caused by Ms. Heard according to	15:17:12

H	1	Mr. Depp; is that right?	15:17:15
	2	A According to Mr. Depp, correct.	15:17:16
	3	Q But what did he say had happened?	15:17:18
	4	A I'm sorry?	15:17:21
	5	Q I'm sorry. What did he say had happened?	15:17:22
	6	What did he tell you?	15:17:26
	7	A He just told me that she went crazy again	15:17:27
	8	and started scratching him and punching him.	15:17:31
	9	Q Where was this?	15:17:34
	10	A You mean which property?	15:17:35
	11	Q Yes.	15:17:37
	12	A I believe it happened at the Hollywood	15:17:46
	13	address. And the reason why I'm -- I'm saying the	15:17:49
	14	Hollywood address is because I'm looking at the	15:17:54
	15	tiles that are behind him, and that's the tile of	15:17:58
	16	his kitchen in his main property, because he owns	15:18:00
	17	several properties in that cul de sac.	15:18:04
	18	Q And that's where he told you it had	15:18:07
	19	happened?	15:18:10
	20	A Correct.	15:18:10
O	21	MS. VASQUEZ: Vague.	15:18:18
	22	Q Just to be clear -- and I think I know the	15:18:21

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1	answer to this, but so we're clear -- you didn't	15:18:23
2	see any argument or any altercation between	15:18:26
3	Mr. Depp and Ms. Heard that day; correct?	15:18:30
4	A Correct.	15:18:38
5	MR. ROTTENBORN: Why don't we take a short	15:18:38
6	break?	15:18:41
7	MS. VASQUEZ: How long do you need?	15:18:41
8	MR. ROTTENBORN: Well, five minutes. Are	15:18:41
9	you -- are you intending to ask Mr. Bett questions	15:18:41
10	or -- let's go off the record.	15:18:41
11	THE VIDEOGRAPHER: We are now off the	15:18:57
12	record. The time is 3:18.	15:18:58
13	(Whereupon, there was a recess in	15:18:58
14	the proceedings.)	15:18:58
15	THE VIDEOGRAPHER: We are now back on the	15:28:10
16	record. The time is 3:28.	15:28:12
17	MR. ROTTENBORN: Can we please pull --	15:28:21
18	pull back up the Sean Bett Witness Statement with	15:28:23
19	Exhibit. It wasn't the last exhibit we looked at.	15:28:29
20	It was maybe two before that.	15:28:33
21	THE TECHNICIAN: Stand by.	15:28:36
22	BY MR. ROTTENBORN:	15:28:37

1 Q Mr. Bett, while she's pulling that up, I 15:28:38
2 need to know, are there any other specific 15:28:41
3 instances that you would testify about where you 15:28:44
4 claim Ms. Heard was abusive to Mr. Depp? 15:28:48

5 MS. VASQUEZ: Objection. Misstates the 15:28:53
6 prior testimony. Lack of foundation. Vague. 15:28:56

7 A I'm going -- I have to go back in -- 15:29:11
8 specifics as far as memory goes. There -- there 15:29:17
9 were quite a few. There was an occasion when we 15:29:24
10 were at the downtown penthouses where he texted me 15:29:27
11 saying she's -- words to the effect of, we're 15:29:32
12 going at it again, she's going at it again with 15:29:35
13 me, get me out of here. And she's screaming and 15:29:37
14 hollering from the top of the -- the landing of 15:29:40
15 the stairs and cursing at him, cursing at me. And 15:29:44
16 I just got him and his bags, and we ended up going 15:29:53
17 back to his LA address. 15:29:57

18 There's been -- as far the date and the 15:30:01
19 time, I couldn't tell you. There were so many 15:30:05
20 incidents, not only with me but Mr. McGivern that 15:30:07
21 worked the shift after me into the wee hours of 15:30:12
22 the night, that Johnny would text him and say, we 15:30:17

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1	need to get out of here, she's going crazy again.	15:30:19
2	And, you know, Travis, I believe, wrote a	15:30:22
3	declaration. So he would have more specifics on	15:30:26
4	all of that. But as far as me giving you a	15:30:29
5	specific date and time right now, I just -- I	15:30:32
6	don't have those notes actually with me or	15:30:34
7	something to recall my memory. Because this, as I	15:30:36
8	said before, was a weekly, biweekly occurrence	15:30:39
9	with them where the arguing would take place.	15:30:42
10	Q Okay. Thank you for that. And I have a	15:30:46
11	few follow-up questions onto that.	15:30:47
12	No. 1 is did you take -- you said, I don't	15:30:49
13	have my notes in front of me.	15:30:54
14	Did you take notes that would refresh	15:30:56
15	your --	15:30:59
16	A Well, I -- I used my -- I had a notebook	15:30:59
17	that I would keep in my computer bag -- incidents.	15:31:03
18	And I would write stuff down saying that Depp told	15:31:05
19	me she slappeded him in the head three times or, you	15:31:09
20	know, injuries on his nose and so forth.	15:31:13
21	Q Has that notebook been produced?	15:31:14
22	A I'm sorry?	15:31:17

1	Q Has that notebook been produced in this	15:31:17
2	case?	15:31:20
3	A No, because I don't know what happened to	15:31:20
4	it.	15:31:23
5	Q When was the last that you knew what	15:31:23
6	happened to it?	15:31:26
7	A You mean the last it was in my possession?	15:31:26
8	Q Yes. That's a terrible question.	15:31:32
9	Yes, when was the last it was in your	15:31:37
10	possession?	15:31:40
11	A It would have been probably five -- four	15:31:40
12	or five years ago, maybe.	15:31:43
13	Q What happened to it?	15:31:46
14	A I don't know. I've looked in my -- you	15:31:47
15	know, my office and in my house. And I don't know	15:31:48
16	if I left it somewhere, one of his properties or	15:31:50
17	what have you, but I just can't find it.	15:31:55
18	Q What was the purpose of you keeping that	15:31:57
19	notebook?	15:32:01
20	A Well, in my line of work, whether it being	15:32:02
21	a peace officer or in security, you got to have,	15:32:07
22	you know, a notebook handy or something handy to	15:32:10

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1	jot down any type of information that takes place.	15:32:13
2	You know, simple things for the clientele or	15:32:16
3	anything, you have to have something to write on	15:32:19
4	and keep with you at all times.	15:32:23
5	Q A book you keep by hand, like with a pen?	15:32:23
6	A Correct.	15:32:27
7	Q But you haven't had it for the last four	15:32:27
8	or five years is your testimony; correct?	15:32:30
9	A Correct.	15:32:32
10	Q This occasion that you say he texted you	15:32:33
11	from the penthouse, did he say that -- he said,	15:32:38
12	we're at it again.	15:32:41
13	I assume you didn't witness any of that	15:32:42
14	argument or alleged altercation, right?	15:32:45
15	MS. VASQUEZ: Objection. Misstates the	15:32:50
16	prior testimony.	15:32:51
17	A Correct.	15:32:51
18	Q You didn't -- he didn't tell you she had	15:32:59
19	been physical with him, right?	15:33:02
20	MS. VASQUEZ: Objection. Misstates prior	15:33:04
21	testimony.	15:33:06
22	A When she did get physical, he would tell	15:33:10

1	me, you know, she smacked me on the side of the	15:33:12
2	head or she tried to throw something at me or	15:33:16
3	whatever. Other times, if it was just a verbal	15:33:20
4	altercation where she's throwing things, he would	15:33:25
5	say that on the way back to the Hollywood house.	15:33:27
6	Q And my question is about the specific --	15:33:30
7	or the incident you mentioned when they were at	15:33:32
8	the penthouse and he asked you to take him back to	15:33:38
9	Hollywood.	15:33:43
10	He didn't tell you during that incident	15:33:44
11	that she had been physical with him, right?	15:33:48
12	A That specific one, it was verbal and --	15:33:51
13	and I believe that was it.	15:33:55
14	Q Did you -- and are there any other	15:33:55
15	specific incidents -- incidents that you can	15:33:59
16	recall in which Mr. Depp allegedly told you that	15:34:03
17	Ms. Heard had been physical with him?	15:34:15
18	A I can't think of anything right now, no.	15:34:17
19	Q Were you ever cushioned for Ms. Heard's	15:34:20
20	safety?	15:34:24
21	MS. VASQUEZ: Objection. Vague.	15:34:24
22	A I never was, no.	15:34:26

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1	Q Did you ever worry about Johnny harming	15:34:29
2	Amber?	15:34:36
3	A No.	15:34:37
4	Q Do you recall the night of May 21st, 2016?	15:34:37
5	A I do.	15:35:02
6	Q I'm sure it comes as no surprise to you	15:35:05
7	that I have to ask you some questions about that	15:35:12
8	night. So what I'd like to do is just start with	15:35:14
9	a kind of overarching question, and then we'll	15:35:23
10	kind of get to the details.	15:35:28
11	But at some point around 7:00 p.m. that	15:35:30
12	evening you, along with Jerry Judge, drove	15:35:33
13	Mr. Depp to the Eastern Columbia building, right?	15:35:40
14	A Correct.	15:35:43
15	Q What had you been doing before that during	15:35:43
16	the day?	15:35:46
17	A Johnny might have had -- or Mr. Depp might	15:35:54
18	have had some meetings, and I believe he was at --	15:35:57
19	he stopped by his LA property. And they -- I	15:36:01
20	believe they had an argument the prior evening or	15:36:10
21	earlier in the day, and Mr. McGivern, Or Travis	15:36:12
22	McGivern, the other night security guy, might have	15:36:21

1 brought Mr. Depp back to his LA address. 15:36:25

2 And then when I came on shift, you know, 15:36:29

3 we did what we had to do throughout the day, and 15:36:31

4 then he wanted to go back there to, initially, 15:36:34

5 retrieve some belongings, but he also wanted to -- 15:36:38

6 they both wanted to talk and calm everything down 15:36:43

7 and so forth. 15:36:52

8 Q And so did you take Johnny over to Eastern 15:36:54

9 Columbia from the Sweetzer Avenue property, the 15:36:59

10 Hollywood property? 15:37:05

11 A It was either we left from the Sweetzer 15:37:06

12 property or from the his production office, which 15:37:11

13 is somewhere -- used to be on Melrose Avenue. But 15:37:14

14 I just can't remember which property we left from 15:37:19

15 to go down to the penthouses. 15:37:23

16 Q What would he do in his production office? 15:37:28

17 A He'd have meetings -- 15:37:31

18 MS. VASQUEZ: Objection. Vague. 15:37:33

19 THE WITNESS: Sorry. 15:37:34

20 MS. VASQUEZ: It's okay. Objection. 15:37:35

21 Vague. 15:37:37

22 A Well, he's the head of the production 15:37:38

1 office, so he would have meetings with his staff 15:37:38
2 or go over work or, you know, things of that 15:37:40
3 nature. 15:37:41

4 Q How much -- over of course of an average 15:37:42
5 week, how much time would he spend there? 15:37:44

6 A It varied from time to time. It -- you 15:37:47
7 know, there were some weeks he didn't have -- he 15:37:50
8 didn't stop by at all. There could be other weeks 15:37:54
9 where he was there for a couple hours.. He could 15:37:56
10 have meetings every other day one week. It just 15:37:59
11 -- it just depended on what his calendar was like 15:38:03
12 for that time period. 15:38:07

13 Q Okay. So you arrived at the Eastern 15:38:14
14 Columbia building around 7:00 p.m. on May 21st, 15:38:17
15 2016. What did you do next? 15:38:23

16 A Myself and Jerry Judge, we went up the 15:38:24
17 elevators to the penthouse. He said that, you 15:38:28
18 know, they're going to talk it out and talk about 15:38:33
19 what's again going on. When I opened up the door, 15:38:36
20 we went inside to the penthouse. 15:38:40

21 Downstairs, there was a bottle of wine out 15:38:43
22 with some glasses. There was candles lit. And 15:38:45

1	this has happened before when they've had argument	15:38:51
2	and I've brought him back. She'll have dinner or	15:38:54
3	candles lit. They'll talk it out. Everything	15:38:58
4	will be normal for a day or two or even a week.	15:39:02
5	At that point Mr. Judge and I told Johnny	15:39:05
6	that we would be standing outside. He said okay,	15:39:10
7	words to the effect of we're just going to talk	15:39:13
8	real quick, and then we'll head back.	15:39:16
9	Q When he said he was going to -- or they	15:39:20
10	were going to talk it out, you said something	15:39:25
11	about the stuff that had been going on.	15:39:26
12	What are you referring to?	15:39:29
13	MS. VASQUEZ: Calls for speculation.	15:39:30
14	A Well, I presume it had to do with all the	15:39:37
15	arguments that had been taking place over the last	15:39:40
16	few days.	15:39:44
17	Q When was the last time they had seen each	15:39:46
18	other before May 21st?	15:39:47
19	MS. VASQUEZ: Calls for speculation.	15:39:51
20	A I -- I would estimate it was probably the	15:39:59
21	evening prior pr perhaps the day prior -- the	15:40:01
22	morning prior to me arriving in to work.	15:40:03

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1	Q And what's the basis for that?	15:40:08
2	A Well, because I remember Travis McGivern,	15:40:21
3	the security guard, you know, telling me that	15:40:25
4	they, you know, that Johnny is going to be at the	15:40:27
5	Hollywood address, that don't bother driving down	15:40:29
6	to the penthouses. That I would have to, you	15:40:33
7	know, drive up to Hollywood.	15:40:35
8	Q Okay.	15:40:36
9	A And then he would relay -- this would --	15:40:42
10	this would be a common occurrence. He would	15:40:44
11	relay, if they argued, and he would tell me, don't	15:40:46
12	bother coming to the penthouses. I'll meet you at	15:40:50
13	the Hollywood address. And this would happen	15:40:54
14	quite frequently.	15:40:56
15	Q Okay. So, but it's your testimony that	15:40:58
16	they had seen each other, like on May 20th or May	15:41:00
17	19th. Is that what you're saying?	15:41:04
18	A I --	15:41:07
19	MS. VASQUEZ: Objection. Assumes facts	15:41:07
20	not in evidence. Misstates the prior testimony.	15:41:15
21	Q You said that they had seen each other the	15:41:17
22	prior evening or morning prior to you arriving at	15:41:17

1	work. I'm just trying to figure out what -- what	15:41:19
2	you meant by that.	15:41:21
3	MS. VASQUEZ: Objection. Assumes facts	15:41:22
4	not in evidence, and misstates prior testimony.	15:41:24
5	A I estimate that the last time he saw her	15:41:28
6	after the argument would have been either in the	15:41:30
7	morning prior to me arriving to the Hollywood	15:41:34
8	address or the evening.	15:41:36
9	Q Okay.	15:41:36
10	When we say -- you referred a few times to	15:41:48
11	the penthouse. Let's just get a lay of the land	15:41:52
12	on -- Johnny owned that whole floor, that whole	15:41:57
13	penthouse floor, right?	15:42:00
14	A Correct, with the exception -- excuse me	15:42:03
15	-- of one penthouse that was directly in front of	15:42:07
16	the elevator door when you exited.	15:42:11
17	Q Was that Penthouse 2?	15:42:13
18	A No. I think it was Penthouse 0 because	15:42:20
19	the penthouses were all labeled 1, 2, 3, 4, 5.	15:42:24
20	This one was like a special studio penthouse that	15:42:28
21	I don't believe had a specific number on it.	15:42:33
22	Q Okay. So he owned penthouses 1, 2, 3, 4,	15:42:33

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1	and 5, right?	15:42:37
2	A Correct.	15:42:39
3	Q Okay. And when you -- you say that you	15:42:39
4	and Mr. Judge accompanied him into the penthouse,	15:42:41
5	that was Penthouse 3 where Ms. Heard was?	15:42:47
6	A Yes.	15:42:53
7	Q And where was Ms. Heard when you walked	15:42:53
8	in?	15:42:57
9	A I believe she was upstairs because she	15:42:58
10	wasn't downstairs when we let him in.	15:43:00
11	Q Did you -- what did you do to ascertain	15:43:03
12	that? Did you see the hall downstairs from the	15:43:07
13	entryway, or did you walk in?	15:43:12
14	A Well, the entryway is set up -- the way	15:43:13
15	the penthouse is set up downstairs, it's an	15:43:17
16	L-shape. So the minute you walk through the door,	15:43:22
17	you walk about 30, 40 feet, and then you hit a	15:43:25
18	wall. When you make a left -- you can only go one	15:43:28
19	way. When you make a left you have the kitchen,	15:43:33
20	the small kitchen area with an island. And then	15:43:35
21	after that it's the living room area, which is	15:43:36
22	maybe 20, 350 feet past that. And then you have	15:43:38

1 stairs to your left. 15:43:43

2 So when Mr. Judge and I took Mr. Depp into 15:43:44

3 the penthouse, we had some of his computer bags 15:43:50

4 with us and bags that he carries, you know, his 15:43:53

5 business materials with, and we sat them on the 15:43:56

6 counter. And that's, you know, when you could see 15:43:59

7 the wine glasses, the wine, the candles being lit. 15:44:01

8 And music was playing. And I didn't see Ms. Heard 15:44:04

9 sitting on the couch or anything, so I presumed 15:44:08

10 she was upstairs. 15:44:11

11 Q But you don't have personal knowledge one 15:44:12

12 way or the other of whether she was downstairs or 15:44:15

13 upstairs? 15:44:17

14 A Well, she definitely wasn't downstairs or 15:44:18

15 I would have seen her. 15:44:22

16 Q So your testimony is she was -- she was 15:44:23

17 not downstairs at all? Nowhere in the downstairs 15:44:25

18 when you brought Mr. Depp into Penthouse 3? 15:44:28

19 A She wasn't downstairs when Mr. Judge and I 15:44:32

20 brought Johnny into Penthouse 3, correct. 15:44:37

21 Q How long did you and Mr. Judge stay in 15:44:40

22 Penthouse 3 when you brought him in? 15:44:45

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	1	A I'd estimate maybe a minute or two.	15:44:47
FSPK	2	Q Was Mr. Depp -- was he carrying wine with	15:44:49
	3	him into Penthouse 3?	15:44:54
	4	A I don't remember what he was carrying.	15:45:02
	5	Q You can't say one way or the other whether	15:45:04
	6	he was carrying wine?	15:45:06
	7	MS. VASQUEZ: Objection. Misstates the	15:45:08
	8	prior testimony. Asked and answered.	15:45:10
FSPK	9	A I can't say right now if he had a bottle	15:45:15
	10	of wine in his hand or not.	15:45:17
	11	Q Was it -- had he been drinking before or	15:45:23
	12	on the way to Penthouse 3?	15:45:27
	13	MS. VASQUEZ: Objection. Calls for	15:45:29
	14	speculation.	15:45:31
FSPK	15	A I can't remember.	15:45:31
	16	Q He could have been?	15:45:34
	17	MS. VASQUEZ: Objection. Misstates the	15:45:35
	18	prior testimony. Asked and answered.	15:45:37
FSPK	19	A It's possible, but I can't remember.	15:45:39
	20	Q So you spent a minute in Penthouse 3 and	15:45:54
	21	then you left.	15:45:58
	22	Where did you go from there?	15:45:59

FSPK	1	A We stood outside in the hallway for a bit.	15:46:01
	2	Q How long is a bit?	15:46:05
	3	A It could have been maybe five or ten	15:46:11
	4	minutes. Maybe a little bit more.	15:46:13
	5	Q And then you went to the guard shack?	15:46:15
	6	A Well, we went to the -- it's not really a	15:46:18
	7	shack. It's just like a -- an extension of	15:46:23
	8	Penthouse 5, I believe. And we went there briefly	15:46:26
	9	to get something to drink, some water or soda.	15:46:30
	10	And then we came back outside.	15:46:34
	11	Q Okay. So there's like a couch in there, a	15:46:36
	12	TV? It's like a --	15:46:40
	13	A There's a -- at the time there were --	15:46:42
	14	there was a couch, maybe a chair, a TV. And there	15:46:44
	15	was like a storage area for, you know, the	15:46:49
	16	penthouse and so forth.	15:46:53
	17	Q Okay. Did you go -- at some point later	15:46:55
	18	in the evening, you went back into Penthouse 3,	15:47:02
	19	right?	15:47:05
	20	A Well, we went back into the hallway after	15:47:05
	21	we were in Penthouse 5's little cubbyhole/guard	15:47:10
	22	shack or what have you, within maybe 10 minutes.	15:47:15

1	5, 10 minutes. And we stood back in the hallway	15:47:19
2	by Penthouse 3 door.	15:47:23
3	Q Did you go into any of the other	15:47:25
4	penthouses before you reentered Penthouse 3 later	15:47:28
5	that evening?	15:47:33
6	A No.	15:47:34
7	Q At some point you went back into	15:47:34
8	Penthouse 3 because you heard some shouting,	15:47:51
9	right?	15:47:59
10	A Right. We heard Amber shouting.	15:47:59
11	Q Did you let your -- was the door to	15:48:02
12	Penthouse 3 locked, and if so, did you key	15:48:05
13	yourself in?	15:48:09
14	A It was locked. I did key myself in.	15:48:09
15	Q Now, you've testified you -- there were --	15:48:12
16	Johnny and Amber had a lot of verbal arguments	15:48:15
17	over the course of -- over the course of the time	15:48:19
18	that they were together, right?	15:48:22
19	A Correct.	15:48:25
20	Q Why did you -- was it your typical	15:48:26
21	practice every time they had an argument and you	15:48:31
22	were in a different room that you would then come	15:48:34

1	to that room?	15:48:36
2	A Well, specifically, this day, not Jerry --	15:48:38
3	Mr. Judge was trying to talk Mr. Depp into not	15:48:47
4	going back to the penthouse. He would always call	15:48:51
5	Johnny Boss. And he would say Boss, why don't you	15:48:57
6	just say there at your LA property, why go down	15:49:00
7	there, just let things cool off another day, and	15:49:04
8	so forth. Because when they would have arguments,	15:49:07
9	Amber would call him up and say let's just talk,	15:49:10
10	they'd have dinner, and that would be that.	15:49:14
11	So we decided instead of waiting with the	15:49:17
12	door open down by Penthouse 5's extension, which	15:49:19
13	you can, you know, hear and see things in the	15:49:25
14	hallway, we decided let's just wait by the door in	15:49:28
15	case we hear screaming or shouting.	15:49:32
16	Q And when you heard that, why did you	15:49:41
17	decide that it was appropriate to let yourself in?	15:49:44
18	MS. VASQUEZ: Objection. Vague.	15:49:50
19	A Well, based on my training and experience,	15:49:52
20	I know an argument's taking place, and you need to	15:49:54
21	get in there and take care of the situation.	15:50:01
22	Q What does that mean?	15:50:05

1	MS. VASQUEZ: Objection. Unintelligible.	15:50:06
2	Q What does take care of the situation mean?	15:50:15
3	A Take care of what?	15:50:17
4	Q What does take care of the situation mean?	15:50:18
5	A Well, whatever is taking place in there,	15:50:21
6	you need to defuse the situation or whatever.	15:50:24
7	Obviously, something's happened if somebody is	15:50:27
8	shouting at the top of their lungs. So you have	15:50:27
9	to separate the parties just like we used to do in	15:50:29
10	the field if there were verbal arguments between	15:50:32
11	spouses or girlfriends and cohabitants and so	15:50:35
12	forth.	15:50:38
13	Q So you took it upon yourself to reenter	15:50:38
14	Penthouse 3.	15:50:41
15	What did you see when you went in?	15:50:43
16	A I saw Mr. Depp standing at the end of that	15:50:44
17	L-shaped corner looking towards Amber. As	15:50:52
18	Mr. Judge and I rounded corner, she was in the	15:50:59
19	living room area with her friend, Raquel	15:51:02
20	Pennington, and she had a look of surprise when	15:51:07
21	she saw Mr. Judge and I. And then she shouted at	15:51:10
22	the top of her lungs, this is the last time you	15:51:15

1	beet me or attack me, or something like that.	15:51:18
2	Mr. Depp -- we were standing in front of	15:51:22
3	Mr. Depp. He was behind us. And he said, what	15:51:25
4	the hell are you talking about, I didn't do	15:51:28
5	anything to you. And then Amber was screaming	15:51:30
6	again, you're not getting to do this to me	15:51:31
7	anymore. And then Mr. Judge told him, Boss, let's	15:51:35
8	just get out of here. And so we got whatever bags	15:51:39
9	were close by like, you know, his personal bags,	15:51:43
10	computer and so forth, and we walked out into the	15:51:47
11	hallway.	15:51:51
12	Q What was Ms. Heard wearing?	15:51:52
13	MS. VASQUEZ: Objection. Vague.	15:51:59
14	Q What was she wearing?	15:52:02
15	A I -- I don't remember.	15:52:03
16	Q How close were you to her?	15:52:04
17	MS. VASQUEZ: Objection. Vague.	15:52:09
18	Q What's the closest you got to Amber?	15:52:13
19	A I'd estimate probably maybe 20 feet. 15,	15:52:14
20	20 feet.	15:52:17
21	Q And you couldn't tell if she was crying,	15:52:18
22	right?	15:52:21

1	MS. VASQUEZ: Objection. Misstates prior	15:52:22
2	testimony.	15:52:30
3	A It's hard to say. She could have been. I	15:52:30
4	can't remember.	15:52:30
5	Q You can't remember? Do you remember	15:52:34
6	telling the UK court that you -- that she wasn't	15:52:36
7	crying?	15:52:43
8	MS. VASQUEZ: Objection. Misstates prior	15:52:43
9	testimony. Improper impeachment.	15:52:46
10	A If that's what I told the -- the UK court,	15:52:49
11	then that's what I believed happened and what I	15:52:52
12	could see.	15:52:55
13	Q Well, I'm trying to get what the truth is.	15:52:58
14	So was she crying or not?	15:53:02
15	MS. VASQUEZ: Objection. Asked and	15:53:05
16	answered. Argumentative.	15:53:06
17	A Well, according to my testimony in the UK	15:53:09
18	court, she wasn't crying.	15:53:13
19	Q So -- but I need your testimony based on	15:53:15
20	what you saw. So my question for you is, was she	15:53:19
21	crying -- actually, I'm looking at it here. You	15:53:30
22	say -- in the UK you say you couldn't remember if	15:53:35

1 she was crying or not. You couldn't tell if she 15:53:39
2 was crying. Is that -- but I'm not trying to 15:53:42
3 impeach you. What I'm asking for is your best 15:53:46
4 recollection of what you saw or what you -- what 15:53:49
5 you did see. 15:53:51

6 So was she crying or not, or could you not 15:53:51
7 tell? 15:53:55

8 MS. VASQUEZ: Asked and answered. 15:53:56

9 A Well, I'm confused. You just said that my 15:54:01
10 testimony stated in the UK court that I said under 15:54:04
11 oath on the stand she was crying. But you're 15:54:08
12 reading it back, and you're saying that I said I 15:54:10
13 couldn't tell if she was crying or not. 15:54:15

14 So I'm -- unless I can refer back to the 15:54:17
15 testimony because, unless I misheard what you were 15:54:19
16 saying, I don't understand. 15:54:23

17 Q Maybe I misspoke. In the UK you said I 15:54:26
18 can't remember if I saw tears on her face. And 15:54:29
19 then they say, was she crying? You said, I could 15:54:33
20 not tell. 15:54:36

21 I'm not asking about that testimony. I'm 15:54:37
22 asking you, as you sit here today, what is your 15:54:39

1	testimony to my question, which is this.	15:54:42
2	Was she crying?	15:54:43
3	MS. VASQUEZ: Asked and answered.	15:54:45
4	A Correct. I answered that. But you told	15:54:48
5	me that I testified in the UK court, that I said	15:54:50
6	she was crying.	15:54:53
7	Q Yeah, and I said if I said that, I	15:54:55
8	misspoke. I just told you what you testified to.	15:54:58
9	And my question is this.. Was she crying?	15:55:02
10	MS. VASQUEZ: Asked and answered.	15:55:06
11	A I can't remember if she was or not.	15:55:06
12	Q Could you tell from 20 feet away?	15:55:08
13	MS. VASQUEZ: Objection. Calls for	15:55:22
14	speculation. Asked and answered.	15:55:23
15	A From 20 feet away, you can tell if	15:55:33
16	somebody has a lot of tears. They could -- they	15:55:37
17	could be sunken tears within their eyelids, which	15:55:39
18	would be difficult to see. But from 20 feet away	15:55:45
19	you'd be able to see tears rolling down on	15:55:48
20	cheekbones.	15:55:52
21	Q So I will ask it again, and I'm just	15:55:54
22	trying to get your recollection and what you	15:55:56

1	observed.	15:55:59
2	Did you observe Ms. Heard crying that	15:55:59
3	night when you walked into the penthouse?	15:56:02
4	MS. VASQUEZ: Objection. Asked and	15:56:05
5	answered. It's becoming harassing.	15:56:06
6	Q Go ahead.	15:56:11
7	A Again, I can't remember if she was crying	15:56:11
8	or she wasn't.	15:56:13
9	Q But if she had been, you believe that you	15:56:19
10	would have observed that?	15:56:23
11	A Correct.	15:56:25
12	Q Where was Raquel Pennington situated with	15:56:25
13	respect to her?	15:56:31
14	A She was standing right next to her.	15:56:32
15	Q Was she -- -- was Raquel between you and	15:56:34
16	Ms. Heard?	15:56:43
17	A No. I was around 20 feet, give or take,	15:56:50
18	from Ms. Heard, and she was standing next --	15:56:52
19	Raquel Pennington was standing next to Amber.	15:56:54
20	Q Now, did Ms. Heard have any redness on her	15:56:59
21	face?	15:57:04
22	A I didn't see any.	15:57:04

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1	Q Did Ms. Heard have any -- you couldn't	15:57:15
2	tell if she was wearing any makeup, right?	15:57:18
3	MS. VASQUEZ: Calls for speculation.	15:57:21
4	A I can't remember if she had any makeup on	15:57:23
5	or not.	15:57:26
6	Q Okay. And you can't remember if she had	15:57:29
7	any injuries to her face either, right?	15:57:34
8	MS. VASQUEZ: Objection. Vague. Assumes	15:57:38
9	facts. Misstates the prior testimony.	15:57:40
10	A No. If she had an injury, I would have	15:57:43
11	seen it, and I would have remembered that.	15:57:46
12	Q Well, it's possible that she had injuries	15:57:49
13	to her face that you didn't observe from 20 feet	15:57:51
14	away, right?	15:57:55
15	MS. VASQUEZ: Objection. Asked and	15:57:56
16	answered. Assumes facts.	15:57:58
17	A No. I would have seen those injuries	15:57:59
18	because Ms. Heard has very, very fair skin. So a	15:58:02
19	slight redness, bruising would show up	15:58:07
20	immediately.	15:58:10
21	Q Is it your testimony that your -- well,	15:58:11
22	let me ask this.	15:58:14

1	I thought you had never seen Ms. Heard	15:58:16
2	have an injury before.	15:58:20
3	So how do you know that an injury to Ms.	15:58:21
4	Heard would have shown up immediately?	15:58:24
5	A Well, I just stated she's got fair skin.	15:58:27
6	If she would have been injured around the facial	15:58:31
7	area or skin that's exposed that you could see, I	15:58:34
8	would have seen it.	15:58:38
9	Q You have no idea, Mr. Bett, how long it	15:58:39
10	would take for you to see a mark on her face if	15:58:43
11	she had just either been hit or slapped or had a	15:58:43
12	phone thrown in her face, do you?	15:58:44
13	MS. VASQUEZ: Objection. Compound.	15:58:45
14	Assumes facts not in evidence. Argumentative.	15:58:47
15	A Well, from past experience, I've been	15:58:54
16	struck. I've had to strike people to defend	15:58:57
17	myself. And redness, irritation shows up	15:59:00
18	immediately after the strike.	15:59:06
19	Q Within one second?	15:59:08
20	MS. VASQUEZ: Objection. Misstates prior	15:59:10
21	testimony. Argumentative.	15:59:11
22	A Within seconds.	15:59:13

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1	Q And you -- you're 100 percent confident	15:59:18
2	that you would have observed it from 20 feet away	15:59:20
3	if Ms. Heard had a facial injury?	15:59:23
4	MS. VASQUEZ: Objection. Misstates prior	15:59:26
5	testimony. Argumentative. Asked and answered.	15:59:27
6	A Well, I would have observed it. And I'm	15:59:31
7	sure LAPD would have observed it two hours later.	15:59:34
8	Q We're not talking about LAPD. I'm talking	15:59:38
9	about you, what you observed.	15:59:44
10	A Right.	15:59:44
11	Q Because we know you don't know what LAPD	15:59:47
12	observed, and we know you don't know what Mr. Depp	15:59:49
13	observed. I need to know what you observed.	15:59:49
14	And you're telling me that it's your	15:59:52
15	testimony under oath that you are 100 percent sure	15:59:53
16	that Ms. Heard didn't have any facial injuries; is	15:59:56
17	that right?	16:00:00
18	MS. VASQUEZ: Objection. Asked and	16:00:00
19	answered. Misstates the prior testimony, assumes	16:00:02
20	facts, and it's argumentative.	16:00:05
21	You don't need to keep reminding this	16:00:11
22	witness he's under oath. We're all very well	16:00:16

1	aware he's under oath.	16:00:19
2	A That's correct. I did not observe any	16:00:20
3	injuries.	16:00:22
4	Q Just because you didn't observe any	16:00:23
5	injuries doesn't mean there weren't any.	16:00:26
6	You'd agree with that, right?	16:00:30
7	MS. VASQUEZ: Objection. Calls for	16:00:32
8	speculation, misstates prior testimony, asked and	16:00:34
9	answered.	16:00:37
10	THE WITNESS: If there were injuries, I	16:00:37
11	would have seen it.	16:00:37
12	Q Your -- what's your eyesight -- what's	16:00:44
13	your prescription?	16:00:49
14	MS. VASQUEZ: Objection. Relevance.	16:00:53
15	And, honestly, don't answer that,	16:00:56
16	Mr. Bett, please. That calls for -- no. No, no,	16:00:59
17	no, no, no. That calls for private medical	16:01:02
18	information. Don't answer that, Mr. Bett. I'm	16:01:06
19	instructing you not to answer.	16:01:11
20	If Ms. Heard won't show me the scars on	16:01:13
21	her feet, Mr. Bett's not going to tell you his	16:01:17
22	eyesight.	16:01:21

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1	BY MR. ROTTENBORN:	16:01:22
2	Q How long have you had glasses?	16:01:22
3	A A couple of years.	16:01:23
4	Q When did you get them?	16:01:25
5	A Around 2019 into 2020. These are actually	16:01:31
6	reading glasses, and I do have 20/20. It's just	16:01:36
7	that by the end of the day and so forth and by	16:01:40
8	reading a lot, it just helps me see a little	16:01:46
9	better because I used to get a lot of headaches.	16:01:48
10	So the doctor says, oh, we're going to give you	16:01:49
11	these glasses.	16:01:52
12	Q Oh, okay. Well, it's 9:30 -- or I guess	16:01:53
13	12:30 where you are. So you've been wearing them	16:01:55
14	the whole time.	16:01:57
15	So have you -- have you worn -- do you	16:01:58
16	wear contact lenses?	16:02:02
17	A No.	16:02:04
18	Q Okay. Just reading glasses?	16:02:04
19	A Correct. And the reason why I wore	16:02:09
20	them is because staring at a computer for a long	16:02:11
21	period of time starts to give me a little bit of a	16:02:15
22	headache. So rather than get a headache, I chose	16:02:18

1 to put my glasses on. 16:02:21

FSPK 2 Q Now, you don't know what transpired in 16:02:23

3 that penthouse while you were outside of it. 16:02:26

4 You'd agree with that, right? 16:02:28

5 MS. VASQUEZ: Objection. Calls for 16:02:31

6 speculation. Incomplete hypothetical. 16:02:32

FSPK 7 A I don't know what was said or what 16:02:39

8 transpired in the penthouse prior to me hearing 16:02:41

9 the shouting. 16:02:45

10 Q And you don't know whether or not Amber 16:02:46

11 Head had a phone thrown at the her face by Johnny 16:02:49

12 Depp, do you? 16:02:54

13 MS. VASQUEZ: Objection. Assumes facts 16:02:56

14 not in evidence. 16:03:02

FSPK 15 THE WITNESS: I don't know what transpired 16:03:02

16 in the apartment prior to Mr. Judge and I making 16:03:04

17 entry. 16:03:09

18 Q And you know bruises can take a while to 16:03:10

19 form, sometimes days, right? 16:03:13

20 MS. VASQUEZ: Objection. Calls for 16:03:15

21 speculation. 16:03:17

22 A Bruises can form, but not redness. 16:03:21

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1	Q Because you are an expert on when redness	16:03:25
2	forms, right?	16:03:28
3	MS. VASQUEZ: Objection. Argumentative.	16:03:29
4	Harassing. Don't -- honestly, Mr. Bett, don't	16:03:32
5	answer that question.	16:03:37
6	MR. ROTTENBORN: Are you literally	16:03:40
7	instructing your client not to answer the	16:03:42
8	question?	16:03:45
9	MS. VASQUEZ: Yeah. He's not testifying	16:03:46
10	as a witness -- as an expert witness, is he?	16:03:47
11	Would you like to --	16:03:51
12	MR. ROTTENBORN: Yeah, you're right, he's	16:03:51
13	not.	16:03:53
14	BY MR. ROTTENBORN:	16:03:53
15	Q Are you an expert on when redness forms	16:03:54
16	after someone's -- in the face?	16:03:54
17	A No. Based on my training and experience	16:03:57
18	with enough domestic violence issues within the	16:04:00
19	Sheriff's Department -- I've seen so many of these	16:04:04
20	transpire, take place, and when somebody is	16:04:08
21	struck, redness forms immediately around the area.	16:04:12
22	Q And, in all instances, you would be able	16:04:15

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1 to see that redness from 20 feet away? 16:04:18

2 A I would because Ms. Heard has very fair 16:04:20

3 skin. 16:04:26

4 Q Even though you had never seen her, 16:04:26

5 according to your testimony, been struck or had 16:04:30

6 any other evidence of -- but somehow you know that 16:04:33

7 if she had been struck, you would have been able 16:04:35

8 to see injuries on her that evening. 16:04:38

9 Is that right? Is that what you're 16:04:40

10 testifying to? 16:04:43

11 MS. VASQUEZ: Objection. Asked and 16:04:44

12 answered. Argumentative. Misstates prior 16:04:45

13 testimony. 16:04:47

14 A Myself and LAPD would have been able to 16:04:51

15 see those injuries. 16:04:54

16 Q So you left the penthouse. 16:05:05

FSPK 17 How long were you in the Penthouse the 16:05:07

18 second time, Penthouse 3? 16:05:09

19 A I'm estimating maybe under a minute. 30 16:05:14

20 seconds to a minute. 16:05:18

21 Q 30 seconds to a minute. So you walk into 16:05:19

22 Penthouse 3 and in 30 seconds to a minute, what do 16:05:24

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FSPK	1	you do? Take Mr. Depp and leave?	16:05:28
	2	A Mr. Judge grabs Mr. Depp and says, Boss,	16:05:30
	3	we're going to leave, let's get out of here. We	16:05:38
	4	picked up, I believe, his computer bag, and we	16:05:41
	5	walked out of the penthouse.	16:05:44
	6	Q And was Mr. Depp -- he had -- did he have	16:05:46
FSPK	7	-- he had wine in his hand when he left the	16:05:52
	8	Penthouse, right?	16:05:56
	9	MS. VASQUEZ: Objection. Assumes facts.	16:05:57
	10	Misstates the prior testimony.	16:06:02
FSPK	11	A I can't remember if he had wine in his	16:06:04
	12	hand or not.	16:06:07
	13	Q He may have?	16:06:13
	14	MS. VASQUEZ: Objection. Calls for	16:06:13
	15	speculation. Asked and answered.	16:06:14
FSPK	16	A I can't remember, sir.	16:06:16
	17	Q But you didn't leave the building	16:06:18
	18	directly. You led Mr. Depp into Penthouse 5 when	16:06:22
	19	you left Penthouse 3; correct?	16:06:29
	20	A Correct.	16:06:30
	21	Q Why did you do that?	16:06:30
	22	A He wanted -- I can't remember. He wanted	16:06:32

1	to look for something inside Penthouse 5 in the	16:06:33
2	living room area, but I just can't remember what	16:06:37
3	it was. So he says, let's go into Penthouse five.	16:06:41
4	Q And while he was in Penthouse 5, he	16:06:46
5	knocked Raquel Pennington's beads on the floor,	16:06:53
6	right?	16:06:57
7	MS. VASQUEZ: Objection. Assumes facts.	16:06:58
8	A He didn't knock anything down.	16:07:02
9	Q And he trashed Amber's office area in	16:07:06
10	Penthouse 5 while he was there too, right?	16:07:10
11	MS. VASQUEZ: Objection. Assumes facts.	16:07:15
12	A He didn't.	16:07:17
13	Q How would you describe Mr. Depp's demeanor	16:07:18
14	when he left Penthouse 3?	16:07:21
15	A He was agitated.	16:07:24
16	Q And what led you to that conclusion?	16:07:25
17	A I'm sorry?	16:07:30
18	Q What -- what about what he was doing or	16:07:31
19	what he was saying led you to that conclusion?	16:07:34
20	A Well, he was breathing heavily. The way	16:07:36
21	he was walking. You can just tell when somebody	16:07:41
22	is, you know, physically upset just by looking at	16:07:43

1	them, their demeanors.	16:07:46
2	Q And it wasn't the first time you had seen	16:07:48
3	Mr. Depp agitated, right?	16:07:51
4	A I've seen him agitated before.	16:07:53
5	Q Did you see him -- did you see him knock	16:07:58
6	over, or you might say drop, any property in the	16:08:01
7	penthouses that evening?	16:08:06
8	A He didn't -- I don't remember him knocking	16:08:15
9	anything over or dropping anything.	16:08:19
10	Q Did you see him throw anything?	16:08:21
11	A No.	16:08:29
12	Q And it is your testimony here today that	16:08:29
13	he didn't -- did he trash any of the penthouses or	16:08:32
14	the property in the penthouses?	16:08:35
15	MS. VASQUEZ: Objection. Vague.	16:08:37
16	A No, he didn't trash anything in that	16:08:37
17	penthouse.	16:08:37
18	Q Did he spill any wine in the penthouse or	16:08:45
19	the hallway?	16:08:47
20	MS. VASQUEZ: Calls for speculation.	16:08:48
21	Assumes facts.	16:08:50
22	A Well, I can't remember if he had wine in	16:08:52

1	his hand or not, but I don't remember, you know,	16:08:55
2	him spilling anything. But I can't remember if he	16:08:58
3	had the wine, as I said.	16:09:01
4	Q Was there anyone in Penthouse 5 when you	16:09:03
5	went in there?	16:09:06
6	A There was.	16:09:07
7	Q Who?	16:09:07
8	A Rocky -- or correction, Raquel	16:09:09
9	Pennington's fiancée, Josh Drew, and a female that	16:09:16
10	I've never seen before and, I believe, a small	16:09:20
11	dog.	16:09:24
12	Q Okay. Did Mr. Depp say anything to them?	16:09:25
13	A He did.	16:09:34
14	Q What did he say?	16:09:37
15	A He said, get the hell out of my penthouse.	16:09:38
16	Q What else did he say?	16:09:43
17	A That's the only thing I remember. He just	16:09:44
18	shouted out loud get the hell out or get the fuck	16:09:47
19	out of my penthouse. And Josh Drew, the female,	16:09:51
20	and the dog, they just walked out.	16:09:54
21	Q Do you know where they went?	16:09:56
22	A No.	16:09:58

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1 Q And was it -- your testimony is that after 16:09:58
2 they left, that he didn't -- he didn't knock any 16:10:04
3 of the -- well, let me strike that. 16:10:10

4 Did you see any of Raquel Pennington's 16:10:12
5 beads arranged or laid out in Penthouse 5? 16:10:16

6 A I can't specifically recall beads. There 16:10:21
7 could have been an easel or a painting or 16:10:24
8 something, but I -- I can't remember. Because 16:10:26
9 they used to always have different types of art 16:10:29
10 things in there and so forth. But I don't 16:10:33
11 remember seeing any beads. 16:10:36

FSPK 12 Q Did Mr. Depp knock anything off the table 16:10:37
13 in any of the penthouses? 16:10:40

14 MS. VASQUEZ: Asked and answered. 16:10:43

FSPK 15 A Yeah, I mean, I can't remember. He could 16:10:46
16 have bumped into something, or I could have, or 16:10:47
17 Mr. Judge could have. But I just -- I can't 16:10:51
18 remember all the articles that were inside that 16:10:53
19 living room/kitchen area. 16:10:55

20 Q Okay. Did you or Mr. Judge destroy any 16:10:57
21 property or knock anything off countertops or 16:11:02
22 tables or anything down that evening? 16:11:05

1	A No.	16:11:08
2	MS. VASQUEZ: Objection. Sorry.	16:11:12
3	Objection. Compound.	16:11:14
4	A Myself and Mr. Judge and Mr. Depp didn't	16:11:17
5	destroy anything. It's possible Mr. Judge,	16:11:20
6	myself, or Mr. Depp could have bumped into	16:11:23
7	something or knocked something over, but nothing	16:11:27
8	was destroyed by us.	16:11:30
9	Q Now, you testified a little while ago	16:11:32
10	about the LAPD.	16:11:38
11	What's your -- obviously, you weren't	16:11:40
12	there when the LAPD showed up, right?	16:11:43
13	A Right.	16:11:50
14	Q What's your -- you seem to know a little	16:11:51
15	bit about what they claim to have seen or not	16:11:54
16	seen.	16:11:57
17	What's your basis for that?	16:11:57
18	MS. VASQUEZ: Again, Mr. Bett, I'm going	16:11:59
19	to caution you, to the extent that it calls for	16:12:02
20	attorney-client privileged information, I'm going	16:12:04
21	to instruct you not to answer. If you have an	16:12:06
22	independent recollection or independent knowledge	16:12:08

1	in response to Mr. Rottenborn's question, you can	16:12:14
2	answer it.	16:12:17
3	A On the advice of counsel, I'm not going to	16:12:18
4	answer that question.	16:12:21
5	Q Have you had contact with anyone in the	16:12:22
6	LAPD regarding Amber or Johnny, ever?	16:12:24
7	MS. VASQUEZ: Vague as to contact. And	16:12:31
8	compound.	16:12:35
9	Q Have you communicated with anyone in LAPD	16:12:38
10	about Amber or Johnny at any point in time ever?	16:12:42
11	MS. VASQUEZ: Compound.	16:12:47
12	A Yes. With his off-duty LAPD security	16:12:53
13	guards who used to work at the estate.	16:12:58
14	Q And who were they?	16:13:00
15	A Gene Arreola and Dimitri Kort.	16:13:01
16	Q Spell their names, please. I know Gene	16:13:05
17	Arreola, I believe. Dimitri?	16:13:05
18	A Dimitri, I'm guessing D-I-M-I-T-R-I. And	16:13:05
19	then Kort is K-O-R-T.	16:13:16
20	Q Now, at some point, Mr. Depp's -- Mr. Depp	16:13:26
21	or his representatives learned the names of the	16:13:32
22	officers who responded to Penthouse 3 on May 21st,	16:13:36

1	2016.	16:13:45
2	Are you aware of that?	16:13:46
3	MS. VASQUEZ: Objection. Compound. Calls	16:13:48
4	for speculation.	16:13:50
5	And again, Mr. Bett, to the extent that	16:13:51
6	you have to disclose attorney-client privileged	16:13:57
7	information to answer that question, I will	16:14:02
8	instruct you not to answer it.	16:14:04
9	A Based on the advice of counsel, I'm not	16:14:06
10	going to answer that.	16:14:08
11	Q Did you have any involvement in	16:14:15
12	ascertaining the names of those officers from	16:14:17
13	LAPD?	16:14:20
14	A No.	16:14:21
15	Q Did you -- do you know who did?	16:14:22
16	MS. VASQUEZ: That's a yes or no question.	16:14:38
17	A No.	16:14:38
18	Q Have you ever been told who did?	16:14:41
19	A No.	16:14:46
20	Q Do you know whether anyone -- if you	16:14:49
21	didn't have communications directly with LAPD to	16:15:05
22	ascertain the names of those officers, did anyone	16:15:07

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1	do it on your request?	16:15:09
2	A No.	16:15:10
3	Q Do you know if anyone did it -- do you	16:15:11
4	know anything about how Mr. Depp or his	16:15:14
5	representatives learned the names of the officers	16:15:17
6	who responded to the penthouse that evening?	16:15:20
7	MS. VASQUEZ: Objection. Assumes facts.	16:15:23
8	Calls for speculation.	16:15:26
9	And, again, to the extent this calls for	16:15:27
10	attorney-client privileged communications, I would	16:15:29
11	instruct you witness not to answer.	16:15:32
12	Q Outside of the -- outside of whatever you	16:15:37
13	may have heard from Mr. Depp's attorneys, do you	16:15:39
14	have any knowledge of how Mr. Depp or his	16:15:42
15	representatives learned the names of the officers	16:15:45
16	who responded to Penthouse 3 that evening?	16:15:46
17	A I learned by watching TMZ.	16:15:59
18	Q Other than watching TMZ, do you have any	16:16:10
19	other knowledge?	16:16:14
20	A I don't.	16:16:14
21	MR. ROTTENBORN: Just bear with me here	16:16:42
22	for a minute.	16:16:44

1	Q Have you ever seen Mr. Depp be violent --	16:17:11
2	physically violent toward any -- any person?	16:17:14
3	A Just in the movies.	16:17:18
4	Q Fair enough.	16:17:20
5	Outside of the movies, have you ever seen	16:17:21
6	Mr. Depp be violent toward any person?	16:17:24
7	A I haven't.	16:17:26
8	Q Have you ever seen him hit anyone?	16:17:27
9	A I haven't.	16:17:29
10	Q Have you ever seen him threaten violence	16:17:31
11	to anyone, even if he's not actually physically	16:17:34
12	violent?	16:17:39
13	A I haven't.	16:17:39
14	Q When you -- when you searched for	16:17:56
15	responsive documents, Mr. Bett, did you search for	16:17:59
16	texts -- well, let me ask you this way.	16:18:03
17	I understand you said that you delete	16:18:06
18	texts at the end of every day or shift or periodic	16:18:09
19	time period between you and Mr. Depp or the people	16:18:15
20	that you're protecting, right?	16:18:19
21	A Mr. Depp and family. Children and so	16:18:21
22	forth.	16:18:23

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1	Q Thank you.	16:18:23
2	Do you delete texts -- and, in particular,	16:18:24
3	I'm talking about the 2013 to 2017 time frame.	16:18:29
4	Did you delete texts between yourself and	16:18:34
5	Mr. Depp's employees?	16:18:38
6	A Yes.	16:18:41
7	Q Did you -- when you were searching for	16:18:42
8	responsive documents, did you produce -- I'm	16:18:50
9	sorry.	16:18:50
10	Did you serve for any texts between you	16:18:54
11	and Nathan Holmes or Stephen Dueters relating to	16:18:56
12	what it was you were looking for or what it was	16:19:03
13	you were asked to produce?	16:19:05
14	A I did and I couldn't find any.	16:19:07
15	Q Did you ever have text message exchanges	16:19:23
16	between you and the other people on the security	16:19:26
17	team?	16:19:29
18	MS. VASQUEZ: Objection. Vague.	16:19:29
19	A Yes, I did.	16:19:31
20	Q Did you search through those text messages	16:19:32
21	for information responsive to our requests?	16:19:34
22	A I did.	16:19:39

1	Q If you learn of anything else that's	16:19:39
2	responsive to our requests that you -- that you	16:19:42
3	haven't produced, I'm going to ask you to advise	16:19:47
4	your attorneys of that immediately. Okay?	16:19:50
5	A Okay.	16:19:59
6	MR. ROTTENBORN: And obviously, Camille,	16:20:00
7	we request a copy of that.	16:20:03
8	Q Sitting here today, are you -- and I just	16:20:05
9	want to be -- I just want to be very -- I know	16:20:08
10	I've sort of asked it a couple different ways, but	16:20:12
11	are there any other instances, specific instances	16:20:17
12	in which you can -- any other specific instances	16:20:20
13	in which you believe or were told that Ms. Heard	16:20:30
14	was violent to Mr. Depp?	16:20:34
15	A Off the top of my head right now, I can't.	16:20:37
16	Q And are there any instances that you have	16:20:42
17	not testified to where Mr. Depp was violent to	16:20:45
18	Ms. Heard?	16:20:50
19	MS. VASQUEZ: Objection. Assumes facts.	16:20:52
20	Misstates the prior testimony.	16:20:54
21	A No.	16:20:54
22	Q Are there any other instance that you	16:21:10

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1	haven't testified before where Mr. Depp threatened	16:21:12
2	Ms. Heard?	16:21:14
3	MS. VASQUEZ: Same objections. Misstates	16:21:14
4	the prior testimony. Assumes facts.	16:21:14
5	A No.	16:21:15
6	Q So it's your testimony that Mr. Depp never	16:21:16
7	threatened Ms. Heard, right?	16:21:19
8	A Correct.	16:21:21
9	Q Did you ever have communications with	16:22:00
10	Dr. Kipper or anyone from his office?	16:22:03
11	MS. VASQUEZ: Objection. Vague.	16:22:05
12	A The front desk receptionist, I guess.	16:22:06
13	Q What was her name?	16:22:12
14	A I can't remember.	16:22:13
15	Q Was that Lisa Dean?	16:22:13
16	A Lisa who?	16:22:16
17	Q Lisa Dean?	16:22:18
18	A No, it doesn't sound familiar.	16:22:22
19	Q Did you have communications with Erin	16:22:25
20	Boerum?	16:22:29
21	A I have, yes.	16:22:29
22	Q She -- she was a nurse in Dr. Kipper's	16:22:39

1	office, right?	16:22:42
2	A Correct.	16:22:43
3	Q When Johnny wanted more of the drugs that	16:22:43
4	Dr. Kipper's office prescribed, would you	16:22:47
5	communicate that request to Dr. Kipper's office?	16:22:49
6	MS. VASQUEZ: Objection. Assumes facts.	16:22:53
7	A That was done by either Nathan Holmes or	16:22:55
8	Stephen Dueters.	16:23:04
9	Q Okay. So that -- so that wouldn't have	16:23:07
10	been done by you?	16:23:09
11	A No. I have done that for him, but	16:23:10
12	generally it was Stephen and Nathan that would	16:23:16
13	take care of that.	16:23:21
14	Q And it's obvious you care very deeply	16:23:22
15	about Mr. Depp, right?	16:23:26
16	A I care about everyone.	16:23:28
17	Q And you care about Mr. Depp, right?	16:23:32
18	That's fair to say?	16:23:36
19	A Right. And I care about everyone because	16:23:40
20	I'm a kind person.	16:23:42
21	Q Have you ever had any conversations with	16:23:43
22	Mr. Depp telling him that he needs to cut back on	16:23:45

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1	his drinking or drug use?	16:23:49
2	MS. VASQUEZ: Objection. I think that's	16:23:51
3	been asked and answered, but --	16:23:53
4	A When you say drug use, are you talking	16:23:58
5	about the illegal drugs or the prescription drugs?	16:24:01
6	Q Both?	16:24:01
7	A Okay. Well, I've told you already, as far	16:24:05
8	as the illegal drugs, I don't know what takes	16:24:08
9	place behind closed doors.	16:24:12
10	The prescription drugs, the drinking,	16:24:15
11	that's between him and his doctors and his	16:24:17
12	familiar. It's not for me to step in. I'm there	16:24:20
13	to make sure that he's safe.	16:24:23
14	Now, obviously if he's drunk, passed out	16:24:24
15	in the middle of Wilshire Boulevard, I'm going to	16:24:28
16	handle the situation. But what he does and what	16:24:31
17	he wants to take, that's his business.	16:24:35
18	Q I understand that. My question was just,	16:24:37
19	have you ever had any conversations with him	16:24:41
20	advising him that he ought to cut back on the use	16:24:43
21	of alcohol or drugs --	16:24:48
22	MS. VASQUEZ: Assumes facts.	16:24:51

1	Q -- whether legal or illegal.	16:24:51
2	MS. VASQUEZ: Sorry. Assumes facts.	16:24:51
3	A No, can't say that I have.	16:24:53
4	Q Do you know if any other security guards	16:24:56
5	have?	16:24:59
6	MS. VASQUEZ: Calls for speculation.	16:24:59
7	Assumes facts.	16:25:01
8	THE WITNESS:	16:25:01
9	A I have no idea.	16:25:02
10	Q Do you know if any other people in	16:25:05
11	Johnny's employment have?	16:25:10
12	MS. VASQUEZ: Same objections.	16:25:13
13	A I have no idea.	16:25:15
14	Q Did Mr. Depp ever say anything to you	16:25:25
15	about being violent to Ms. Heard?	16:25:28
16	A No.	16:25:44
17	Q Did he ever admit to you having been	16:25:44
18	violent toward her?	16:25:48
19	MS. VASQUEZ: Asked and answered. Assumes	16:25:49
20	facts.	16:25:52
21	A No.	16:25:52
22	Q Did you ever commit to you being a	16:25:53

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1	screw-up or words of a similar nature?	16:25:55
2	A No.	16:25:59
3	MS. VASQUEZ: Objection. Vague.	16:25:59
4	Q Have you ever heard Mr. Depp refer to how	16:26:04
5	he can get sometimes as the monster?	16:26:07
6	MS. VASQUEZ: Objection. Assumes facts.	16:26:12
7	Vague.	16:26:14
8	A I haven't.	16:26:33
9	Q You say in your witness statement that	16:26:34
10	Ms. Heard -- you talk about the way that she	16:26:42
11	allegedly treated Mr. Depp, and then you said Ms.	16:26:49
12	Heard often behaved in this way when she had been	16:26:54
13	drinking.	16:26:57
14	I learned quickly to recognize the signs	16:26:58
15	so that we were able to leave the situation where	16:27:00
16	it escalated further.	16:27:04
17	MR. ROTTENBORN: Actually, let's -- let's	16:27:06
18	just pull that up. So the exhibit that's called	16:27:08
19	Sean Bett Witness Statement with Exhibit, please.	16:27:13
20	THE TECHNICIAN: Please stand by.	16:27:15
21	MR. ROTTENBORN: Thank you.	16:27:19
22	THE TECHNICIAN: Exhibit 4.	16:27:20

1	MR. ROTTENBORN: Thank you.	16:27:23
2	BY MR. ROTTENBORN:	16:27:39
3	Q Can you go to paragraph 6 and 7, please?	16:27:39
4	A Okay.	16:27:43
5	Q And I didn't want to paraphrase, but you	16:27:43
6	talk about Ms. Heard often behaving in a certain	16:27:47
7	way when she was drinking.	16:27:50
8	And my question for you is, can you --	16:27:52
9	again similar to the other questions, I just need	16:27:57
10	to know what you recall. Can you remember	16:27:59
11	specifically any instances in which she behaved	16:28:01
12	the way you're describing in paragraph 7?	16:28:07
13	Specifically.	16:28:10
14	A A specific date and time, I can't give	16:28:15
15	you. But I will say that did happen quite often.	16:28:18
16	Q And can -- without a specific date and	16:28:21
17	time, can you -- can you recall any specifics	16:28:27
18	about when that happened?	16:28:32
19	A Well, she would get snappy with myself or	16:28:38
20	Mr. Depp. Her mood would change, especially if	16:28:41
21	she drank a lot of the wine and so forth, or if	16:28:45
22	she had her friends over, i.e., you know, Raquel	16:28:49

1	Pennington or her sister Whitney.	16:28:53
2	And she would just have a different	16:28:57
3	demeanor than if she wasn't drinking. Because	16:28:59
4	when she wasn't drinking, for the most part, she	16:29:02
5	was quite pleasant. But it was when she started	16:29:06
6	drinking, she would get a different attitude as if	16:29:11
7	the people that worked for Mr. Depp, you know,	16:29:14
8	worked for her and she signed our paychecks.	16:29:17
9	There would be different mood swings.	16:29:20
10	Q All right. And it was very, very clear	16:29:22
11	that you didn't work for her, right?	16:29:25
12	MS. VASQUEZ: Objection. Misstates the	16:29:27
13	prior testimony.	16:29:29
14	A I worked for Mr. Depp. However, anybody	16:29:31
15	associated with him, we still had a job to do at	16:29:34
16	the request of Mr. Depp. And being that they were	16:29:38
17	married, we theoretically do work for her.	16:29:43
18	However, Mr. Depp and his management company are	16:29:49
19	the ones that sign the paychecks.	16:29:53
20	Q And you work for -- you work at Mr. Depp's	16:29:56
21	direction; correct?	16:29:58
22	MS. VASQUEZ: Objection. Misstates the	16:30:00

1	prior testimony.	16:30:01
2	A Correct, we do work for Mr. Depp.	16:30:02
3	Q Mr. Depp had a different demeanor when he	16:30:06
4	had been drinking, right?	16:30:10
5	MS. VASQUEZ: Objection. Assumes facts.	16:30:11
6	Calls for speculation. Vague.	16:30:14
7	A I've noticed when Mr. Depp drinks, he	16:30:16
8	becomes very happy and very funny.	16:30:19
9	Q Do you believe it's happy and funny to	16:30:39
10	slam cabinet doors when you've been drinking?	16:30:42
11	MS. VASQUEZ: Objection. Argumentative,	16:30:47
12	harassing, assumes facts, calls for speculation,	16:30:50
13	lack of foundation.	16:30:54
14	A I don't know, I've never slammed a cabinet	16:30:57
15	door when I've been drinking.	16:31:01
16	Q Right. I was just asking, if Mr. Depp	16:31:04
17	were to start slamming cabinet doors when he had	16:31:07
18	been drinking, is that happy and funny?	16:31:11
19	MS. VASQUEZ: Objection. Assumes facts,	16:31:13
20	incomplete hypothetical, misstates the prior	16:31:16
21	testimony.	16:31:19
22	A I would -- you would have to ask -- you're	16:31:20

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1 asking me to guesstimate or estimate on how 16:31:23
2 somebody should act when they've been drinking and 16:31:27
3 they slam a cabinet door? 16:31:30

4 I don't understand the question. 16:31:32

5 Q We'll move on. 16:31:32

FSPK 6 And you would agree that someone getting, 16:31:37
7 -- as you referred to, getting snappy with someone 16:31:40
8 else, that doesn't merit them being punched or hit 16:31:43
9 or having their hair pulled or choked, right? 16:31:47

10 MS. VASQUEZ: Objection. Compound. 16:31:51

11 Assumes facts. Argumentative. 16:31:53

FSPK 12 A If somebody is snappy or moody, I would 16:32:00
13 say, yeah, you -- that's not comparable to pulling 16:32:03
14 one's hair or nails out of their fingers. 16:32:07
15 Q It's not comparable to hitting them, 16:32:12
16 right? 16:32:15

17 MS. VASQUEZ: Same objections. 16:32:16

FSPK 18 A It's the same, correct. 16:32:18

19 Q Not comparable to throwing something at 16:32:19
20 them? 16:32:23

21 MS. VASQUEZ: Same objections. 16:32:23

FSPK 22 A Not the same. 16:32:25

1	Q And you never saw Ms. Heard throw	16:32:34
2	something at Mr. Depp, right?	16:32:37
3	A She threw a coffee mug or a water bottle	16:32:40
4	from the stairs once when she was screaming at him	16:32:49
5	when we were leaving. And she just happened to be	16:32:54
6	yelling at him at the time I walked in, and we	16:32:58
7	left.	16:33:01
8	Q And you saw her do this?	16:33:01
9	A Yes. She threw it from the second landing	16:33:04
10	of the stairs.	16:33:07
11	Q Where was this?	16:33:08
12	A In the downtown Penthouse 3.	16:33:09
13	Q When?	16:33:13
14	A It would have been sometime 2014, '15,	16:33:15
15	maybe.	16:33:23
16	Q What time of day?	16:33:27
17	A It would have been in the daytime. I	16:33:34
18	couldn't give you a specific time.	16:33:41
19	Q And how do you know she threw it at him?	16:33:41
20	A Well, they were the only two in the house.	16:33:45
21	She was yelling from the landing of the steps. I	16:33:47
22	saw the coffee mug or water bottle come down and	16:33:52

1	land in the area that Mr. Depp was standing. And	16:33:55
2	then we left.	16:33:59
3	Q Did you see her throw it?	16:33:59
4	A Well, it came from her direction. I	16:34:01
5	didn't physically see her wind up like a pitcher	16:34:04
6	and throw it, no.	16:34:07
7	Q Did you see where she was standing?	16:34:08
8	A She was on the landing of the stairs up to	16:34:09
9	the bedroom.	16:34:13
10	Q Could you see her from where you were	16:34:13
11	standing?	16:34:15
12	A I could.	16:34:15
13	Q Did -- did it break?	16:34:16
14	A No, it just bounced.	16:34:18
15	Q Did it hit Mr. Depp?	16:34:21
16	A It hit the ground in front of him.	16:34:24
17	Q What were they arguing about?	16:34:28
18	A I don't know. He didn't say in the car.	16:34:32
19	Q Did you ever see him throw something at	16:34:36
20	her?	16:34:41
21	A No.	16:34:42
22	Q Did you ever -- are there any other	16:34:42

1	occasions where you would allege that Ms. Heard	16:34:45
2	threw something at Mr. Depp?	16:34:50
3	MS. VASQUEZ: Objection. Asked and	16:34:52
4	answered.	16:34:52
5	A I can't think of any right now.	16:34:54
6	MR. ROTTENBORN: Okay. That's all the	16:35:15
7	questions I have for you subject to I may have	16:35:17
8	some follow-up questions if your counsel has any	16:35:17
9	questions for you. But I don't have anything else	16:35:17
10	for you at this time.	16:35:19
11	MS. VASQUEZ: I don't have any questions	16:35:19
12	for Mr. Bett either.	16:35:22
13	So Mr. Rottenborn, do you have anything	16:35:24
14	further? Do you want to look at your notes or	16:35:26
15	anything, or are we -- are we done here?	16:35:29
16	MR. ROTTENBORN: Let me just take 60	16:35:34
17	seconds. Let's stay on the record, but I think	16:35:37
18	we're done.	16:35:40
19	MS. VASQUEZ: Sure.	16:35:41
20	BY MR. ROTTENBORN:	16:35:41
21	Q Did you ever stop -- was there ever an	16:36:48
22	incident where you stopped Amber from attacking	16:36:51

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1	Johnny?	16:36:59
2	A No, I can't -- I don't recall any.	16:37:03
3	Q Were there ever any occasions where you	16:37:07
4	had stopped Johnny from attacking Amber, or where	16:37:10
5	you thought that if you didn't remove him, he	16:37:14
6	might?	16:37:17
7	A No.	16:37:17
8	Q That's all I have. Thank you?	16:37:18
9	A Thank you.	16:37:20
10	THE REPORTER: Are we off the record,	16:37:20
11	counsel?	16:37:20
12	MR. ROTTENBORN: Yes.	16:37:20
13	MS. VASQUEZ: Yes.	16:37:20
14	THE VIDEOGRAPHER: This marks the end of	16:37:30
15	the deposition. We are now going off the record.	16:37:31
16	The time is 4:37.	16:37:34
17	(Off the record at 4:37 p.m.)	16:37:45
18		
19		
20		
21		
22		

1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

2
3 I, Jessica Shines, the officer before whom the
4 foregoing deposition was taken, do hereby certify
5 that said proceedings were electronically recorded
6 by me; that reading and signing was not requested;
7 and that I am neither counsel for, related to, nor
8 employed by any of the parties to this case and
9 have no interest, financial or otherwise, in its
10 outcome.

11
12 IN WITNESS WHEREOF, I have hereunto set my hand
13 and affixed my notarial seal this 31st day of
14 January, 2022

15
16 Notary Registration No.: 7955160
17 My Commission Expires: 11/30/2025

18 
19

20 Jessica Shines, Certified Shorthand Reporter,
21 Registered Professional Reporter, and Notary
22 Public for the Commonwealth of Virginia

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